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④ AUTOMATIC DOCUMENT PAGE TURNING APPARATUS.

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Description**Technical Field**

This invention relates to document page turning apparatus of the kind including feeding means adapted to feed a multiple page document along a feed path to a turning station, document bowing means adapted when actuated to engage and move a document positioned at said turning station to a bowed configuration, turning means adapted to engage the top page of a bowed document and operable to move said top page to a partially open position adjacent said turning means, and control means adapted to operate said feeding means to feed the document along said feed path such that said turning means engages and moves the partially opened top page to a fully open position.

The invention was a particular application where the multiple page document is a passbook. By a passbook therein is meant a book having a relatively thick cover and relatively thin pages, suitable for recording the transactions, such as deposits and withdrawals, of a customer of a financial institution such as a bank.

Background Art

Document page turning apparatus of the kind specified in known from U.S. Patent No. 4,280,036 which discloses an automatic bank depositing machine wherein the amount of cash deposited by a customer in the machine is automatically recorded at the appropriate location in a passbook which is manually inserted into the machine in an open condition and is automatically fed completely into the machine for printing. The known apparatus includes an automatic page turning mechanism which is effective to turn over a page of the passbook when that page is full and further printing is required, the passbook being fed back to the printing position for further printing on the new page.

The page turning mechanism disclosed in said U.S. Patent includes friction rollers which are pressed against the passbook when in an open position while clamp means spaced from the rollers rigidly hold the passbook stationary. Support pins penetrate beneath the uppermost leaf of the open passbook, which has been partially lifted by the rotation of the friction rollers. The passbook is then moved such that the partially open page is fully opened by contact with the support pins. The known apparatus has been found to have the disadvantage that the cover of a passbook cannot be turned due to the thickness and stiffness thereof and the passbook has to be inserted into the printing apparatus by the clerk in an open condition. This limitation prevents the known mechanism from being used in Automatic Teller Machines (ATM's).

Document page turning apparatus of the kind specified is known from GB—A—2 103 585. This known page turning apparatus is incorporated in an automatic cash withdrawal machine for use in a bank. A customer inserts his passbook into the

machine in an open condition, whereafter the machine reads prescribed information concerning the customer from the passbook and prints relevant information concerning the withdrawal transaction on the open page of the passbook. When the last line of a page has been printed, the passbook is moved to the page turning apparatus, which turns the completed page to make a new page available for printing. The known apparatus also has the capability of turning a page of the passbook in a backward direction if two or more pages are turned in error in a forward direction or if the passbook is inserted in an open condition at an incorrect page. However, this known apparatus also has the disadvantage that there is no provision for turning the cover of the passbook, which has to be inserted into the machine in an open condition.

Disclosure of the Invention

It is an object of the present invention to provide document page turning apparatus of the kind specified wherein the aforementioned disadvantage is alleviated.

Therefore, according to the present invention, there is provided page turning apparatus of the kind specified, characterized in that said document is a passbook having a relatively thick cover and relatively thin inner pages, in that sensing means coupled to said control means are provided adjacent said feed path, adapted to sense whether said passbook is in a closed or an open condition, and in that said control means is adapted to cause said drive plate member to be operated with a relatively high or a relatively low pressure level according as said passbook is in a closed or an open condition.

It will be appreciated that in apparatus according to the invention, documents such as passbooks can be fed to the turning station in a closed condition thereby permitting the top page (cover) of the document to be turned.

An embodiment of the invention, which will be described in more detail hereinafter, comprises a mechanism for turning over the cover and the inner pages of a passbook of other type of multiple-page document which includes a guide chute along which a closed passbook is transmitted to a page turning station, a page turning roller positioned adjacent the guide chute at the page turning station which is adapted to be rotated in a page-turning direction, a drive member

mounted adjacent the guide chute opposite the page turning roller which is movable in a direction to engage and move the passbook into a bowed position in which the top page or cover of the passbook is engaged by the page turning roller whose operation turns the cover or the page of the passbook to a partially open position and then to a fully open position upon movement of the passbook along the guide chute and control means for controlling the amount of force exerted by the drive member on the passbook whereby the force applied to the drive member varies depending on whether the cover or another page of the passbook is to be turned.

Brief Description of the Drawings

One embodiment of the present invention will now be described by way of example, with reference to the accompanying drawings, in which:

Fig. 1 is a side view of the page turning apparatus of the present invention showing the linkage arrangement for moving the drive member into engagement with the passbook;

Fig. 2 is a partial side view of the page turning apparatus of Fig. 1 showing the location of the passbook prior to a page turning operation;

Fig. 3 is a partial side view of the page turning apparatus of Fig. 1 showing the drive member in an actuated position and the passbook in a bowed configuration;

Fig. 4 is the same view as Fig. 3 showing the position of the page turning roller after the cover or page member has been rotated to an engaging position with the page turning roller support member;

Fig. 5 is the same view as Fig. 4 showing the passbook after its initial movement resulting in the page turning roller turning over the cover or page member of the passbook to a partial open position;

Fig. 6 is the same view as Fig. 5 showing the position of the passbook after the cover or page member has been turned to an open position;

Fig. 7 is a block diagram of the control system of the page turning apparatus;

Fig. 8 is a schematic diagram of the control circuit for varying the force exerted on the passbook by the drive member;

Figs. 9A and 9B taken together disclose a detailed flowchart of the page turning operation.

Best Mode for Carrying Out the Invention

Referring now to Fig. 1, there is disclosed a side view of the page turning apparatus of the present invention which is indicated generally by the numeral 20 and which includes a page turning roller 22 rotatably mounted on a support member 24 in which the roller 22 is operated by a conventional drive means such as a motor 23 (Fig. 7). The roller 22 is mounted adjacent a plurality of guide plate members 26, 27 and 28 which form a guide chute 30. The guide plate member 26 is slidably mounted for longitudinal movement to the dotted position shown in Fig. 1 by a drive mechanism (not shown) operated by a drive member 27 (Fig. 7). Mounted adjacent the guide chute 30 are a plurality of rubber drive rollers 32-36 inclusive operated by a conventional motor-driven belt (not shown) in which each of the drive rollers coacts with an associated pressure roller 38-42 inclusive in a manner that is well-known in the art to move a closed passbook along the guide chute 30.

Located adjacent the guide plate member 28 opposite the page turning roller 22 is a U-shaped or arcuate drive plate member 44 having a depending support portion 46 to which is rotatably mounted by means of a stud 48 on end of an arm member 50. The other end of the arm member 50 is fixed to a rotatably mounted shaft

member 52 to which is also fixed one end of a second arm member 54. The other end of the arm member 54 is rotatably connected to one end of a link member 56 by means of the stud 58. In a similar manner, the link member 56 is rotatably connected by means of a stud 60 to one end of a lever member 62 which in turn is rotatably mounted on a fixed shaft member 64. The other end of the lever member 62 is rotatably secured by means of a stud 66 to one end of an armature member 68 associated with a solenoid 70. Also engaging the stud 66 is one end of a spring member 71 for normally returning the lever member 62 to its home position. As will be described more fully hereinafter, energizing of the solenoid 70 results in the upward movement of the drive plate member 44.

Referring now to Figs. 2-7 inclusive, there is shown side views of the page turning mechanism during a page turning operation together with the control unit for operating the page turning mechanism. As shown in Fig. 2, a closed passbook member 72 with its bound edge portion orientated in the forward direction is driven by the feed rollers 32 and 34 in a left-to-right direction as viewed in Fig. 2. The passbook member 72 is sensed by a pair of photodetectors 74, 76 which cooperate with a light source 78 in a manner that is well-known in the art to sense the leading and trailing edges of the passbook member 72. Signals generated by the photodetectors 74, 76 are transmitted to a control unit 80 (Fig. 7) which detect whether the passbook member 72 is in an open or closed condition by measuring the time interval between the operation of the photodetectors 76 and 74. The control unit 80 comprises a microprocessor and firmware which control various portions of the page turning mechanism in a predetermined order in response to receiving control signals transmitted from the photodetectors 74, 76 together with signals generated from an operator's keyboard 118 (Fig. 7) or transmitted over line 120 from an external device such as an ATM. As will be described more fully hereinafter, detecting the closed or open position of the passbook will control the amount of pressure that the drive plate member 44 will exert on the passbook 72 upon movement of the drive plate member into engagement with the passbook member.

In response to the signals generated by the photodetectors 74, 76 a reversible drive motor 27 (Fig. 7) operatively connected to the guide plate member 26 (Fig. 1) by any conventional means such as a rack and pinion mechanism will slide the guide plate member 26 to the left as shown in Fig. 3 removing the guide plate member from a blocking position with respect to the drive plate member 44. After the guide plate member 26 has been moved to an actuated position (Fig. 3), the control unit 80 will output control signals over line 88 to a drive plate control unit 90 which outputs energizing signals to the solenoid 70 (Figs. 1 and 7). The operation of the solenoid 70 results in the movement of the armature member 68 to the

right as viewed in Fig. 1 actuating the linkage arrangement connecting the drive plate member 44 resulting in the movement of the drive plate member 44 in an upward direction engaging the passbook member 72. The passbook member 72 at this point has its bound end engaged and held by the drive roller 34 and the pressure roller 40. Movement of the drive plate member 44 moves the passbook member 72 into a curved or bowed configuration (Fig. 3) allowing the cover or top page member 102 to engage the page turning roller 22. At this time, the roller 22 is being rotated in a counterclockwise direction by the motor 23 (Fig. 7) under the control of a control unit 94 which in turn is operated in response to control signals transmitted over line 96 from the control unit 80.

Rotation of the page turning roller 22 results in the cover or top page member 102 being rotated to a position which intercepts a light beam 103 outputted from a light source 104 (Figs. 1 and 3) and which is normally detected by a photodetector 106. The interception of the light beam 103 by the cover member or top page member 102 results in the photodetector member 106 outputting a signal to the control unit 80. The control unit 80 in response to receiving the signal from the member 101 will output a control signal to the drive plate control unit 90 which deenergizes the solenoid 70 allowing the spring member 71 (Fig. 1) to return the armature member 68 to its home position moving the drive plate member 44 in a downward direction (Fig. 4). The roller member 22 continues rotating in a counterclockwise direction for a predetermined time period rotating the cover or top page member 102 to a partially-open position adjacent the roller support member 24 (Fig. 4). After the predetermined time period has elapsed, the control unit 80 will output appropriate control signals to the page turning roller control unit 94 (Fig. 7) which disables the motor 23 stopping the rotation of the page turning roller member 22.

The control unit 80 will also output control signals to the feed roller control unit 108 (Fig. 7) which operates a stepping motor 110 which in turn operates a belt drive system (not shown) for rotating the feed rollers 32, 34 (Fig. 5) in a counterclockwise direction. This rotation of the feed rollers results in the leftward movement of the passbook member 72 as viewed in Fig. 5 resulting in the stationary page turning roller 22 rotating the partially opened cover member 72 to a completely open position (Fig. 6). The rotation of the cover or top page member 102 to an open position enables the photodetector 106 (Fig. 3) to generate a signal which is transmitted to the control unit 80. In response to receiving this signal, the control unit 80 will output the appropriate control signals to the guide plate control unit 84 (Fig. 7) which operates the motor 86 to move the guide plate member 26 to its home position (Fig. 1). At this time, the feed rollers 112, 32-36 inclusive (Fig. 6) are operated to drive the open passbook member 72 through the guide chute 30

to a position adjacent a printing mechanism (not shown) where printing on the open cover member 102 occurs. For a complete description of the processing of the passbook member 72, reference may be made to the previously cited international application.

Where an inner page member of the passbook member 72 is required to be turned, the passbook member is again positioned adjacent the drive plate member 44 (Fig. 2) and the sequence of operation of the drive plate member 44 and the page turning roller 22 is repeated. In this instance, the pressure exerted by the drive plate member 44 on the passbook member 72 is reduced in a manner to be described more fully hereinafter. Where alternative printing operations are to occur on either side of the same page or alternate pages of the passbook member, the passbook member is positioned adjacent the drive plate member 44 with the bound edge portion of the passbook member held between the feed roller 32 and the pressure roller 38 (Fig. 2). A drive member 114 (Fig. 7) engaging the page turning roller 22 is energized by signals transmitted from the page turning roller drive control unit 116 (Fig. 7) as a result of the control unit 80 receiving control signals from either the operator control unit 118 or over line 120 from an external control device. Energizing of the drive member 114 results in the movement of the page turning roller member 22 to the dotted position shown in Fig. 1 adjacent the pressure roller 40. The control unit 80 will output control signals to the page turning roller control unit 94 resulting in the energizing of the roller drive motor 23 for rotating the page turning roller member 22 in a clockwise direction enabling the page of the passbook engaged by the roller 22 to be turned in a clockwise direction to an open position upon the subsequent movement of the passbook to the right as viewed in Fig. 1.

Referring now to Fig. 8, there is shown a schematic diagram of a control circuit found in the drive plate control unit 90 (Fig. 7) for varying the pressure applied by the drive plate member 44 on the passbook member 72. Included in the circuit are cascaded pairs of NPN transistors 122 and 124. When the cover or top page member 102 of the passbook member 72 is to be turned to an open position, the control unit 80 (Fig. 7) transmits an energizing signal over line 126 in addition to an enabling signal over line 127 turning on the pair of transistors 122 which enables current to flow from a 24 volt power supply through the solenoid 70 at a level producing a force which is applied to the passbook member 72 by the drive plate member 44 corresponding to a power level as follows.

$$W = 24V/20 \times 24V = 28.8W$$

Where an inner page member of the passbook member 72 is to be turned, an energizing signal is transmitted over line 128 which turns on the cascaded pair of transistors 124. The current flowing through the solenoid 70 produces a

pressure force on the passbook member 72 in accordance with the following power level.

$$W = 24V/(20 + 22) \times 24V = 13.7W.$$

It is obvious that these values are exemplary and other values can be selected in accordance with the thickness and stiffness of the cover and the inner pages of the passbook member or other documents being processed.

Referring now to Figs. 9A and 9B inclusive, there is disclosed a flowchart of the page turning operation. When the passbook member 72 is initially sent to the page turning mechanism at the start (block 130) of the operation, a signal initiating the operation of the page turning mechanism (block 132) is transmitted either from the operator control unit 118 (Fig. 7) or over line 120 from an external control device such as a keyboard on an ATM. The generation of the signal results in the microprocessor in the control unit 80 generating a cover turn flag (block 134) enabling the feed roller control unit 108 (Fig. 7) operating the stepping motor 110 to feed (block 136) the passbook member 72 to a page turning position (Fig. 2). The guide plate member 26 is then removed (block 138) from a blocking position adjacent the drive plate member 44. The member 44 is then moved to a position engaging the passbook member (Fig. 3) upon the energizing of the solenoid 70 (block 140) in a high power mode. If the passbook member 72 is in an open position, the steps of starting (block 142), initiating (block 144) an operation, feeding (block 146) the passbook member to a page turning position, opening (block 148) the guide plate member and energizing (block 150) the solenoid 70 is repeated except that the energizing of the solenoid occurs in the low power mode.

After the passbook member 72 has been moved into engagement with the page turning roller 22 (Fig. 3), the roller is operated (block 152) to bow the cover or page member 102 of the passbook member and the photodetector 106 is checked to see if a signal has been generated (block 154) indicating the interception of the light beam 103 by the curved cover or page member (Fig. 3). If the signal is not present, the roller 22 continues operation (block 152). If the signal is present, the solenoid 70 is deenergized (block 156). The system will wait (block 158) for a predetermined time period until the cover or inner page member 102 is positioned on the roller support member 24 (Fig. 4). After the predetermined time period has elapsed, the roller 22 is disabled (block 160) (Fig. 9B) and the feed rollers 32, 34 (Fig. 5) are operated (block 162) to move the passbook member in a direction enabling the stationary roller 22 to rotate the cover or inner page member to a fully opened position. The system will check the output of the photodetector 106 to see if the turning of the cover or inner page member 102 has been completed (block 164). If the turning operation has not been completed, the passbook member 72 is moved further to a position (block 166)

where the turning of the cover or inner page member is completed. If the turning operation has been completed, the passbook member is transmitted (block 168) either to a printing station or to a completed turning position where the passbook is held in an open position which completes the page turning operation.

It will be seen from this construction that a passbook member in a closed position can be processed automatically to allow printing to occur on the cover member and the inner page members. This allows the page turning mechanism to be employed in ATM's or other remote facilities which do not require the presence of a bank clerk or other type of operator.

Claims

1. Document page turning apparatus, including feeding means (32, 42) adapted to feed a multiple page document (72) along a feed path to a turning station (20), document bowing means (44) adapted when actuated to engage and move a document (72) positioned at said turning station (20) to a bowed configuration, turning means (22) adapted to engage the top page (102) of a bowed document (72) and operable to move said top page (102) to a partially open position adjacent said turning means (22), and control means (32—42) to feed the document along said feed path such that said turning means (22) engages and moves the partially opened top page (102) to a fully open position, characterized in that said document is a passbook (72) having a relatively thick cover and relatively thin inner pages, in that sensing means (74, 76, 78) coupled to said control means (80) are provided adjacent said feed path, adapted to sense whether said passbook is in a closed or an open condition, and in that said control means (80) is adapted to cause said drive plate member (44) to be operated with a relatively high or a relatively low pressure level according as said passbook is in a closed or an open condition.

2. Document page turning apparatus according to claim 1, characterized in that said feeding means includes a pair of rollers (34, 40) adapted to engage and hold an edge of said document (72) when said document (72) is located in said turning station (20).

3. Document page turning apparatus according to claim 2, characterized in that said document bowing means includes a drive plate member (44) mounted for movement in a direction perpendicular to said feed path.

4. Document page turning apparatus according to claim 3, characterized in that the drive plate member (44) is of a generally arcuate shape.

5. Document page turning apparatus according to claim 4, characterized in that said drive plate member (44) is adapted to be actuated by electromagnetic drive means (70) coupled to said plate member (44) by a linkage including a plurality of rotatably mounted link members (54, 56).

6. Document page turning apparatus according to claim 5, characterized in that said electromagnetic drive means includes a solenoid operable by a solenoid control circuit (122, 124) adapted to selectively control the pressure exerted by said drive plate member (44) on said document (72) to avoid relatively high or relatively low pressure levels.

7. Document page turning apparatus according to claim 1, characterized in that said turning means includes a page turning roller (22) rotatable to move said top page (102) to said partially open position and, by a sensing device (104, 106) coupled to said control means (80), said control means (80) being adapted, when said top page (102) has been moved a predetermined amount, to cause said document bowing means (44) and said page turning roller (22) to be deactuated, and to render said feeding means (32—42) operative to move said document (72) along said feed path, whereby said top page (102) is moved to the fully open position.

8. Document page turning apparatus according to claim 7, characterized in that said page turning roller (22) is controllable to rotate in a forward or a reverse direction of rotation and is mounted for movement between alternative locations adjacent said feed path, whereby pages may be turned in a selected direction of turning.

Patentansprüche

1. Belegseiten-Wendegerät mit Fördervorrichtungen (32, 42) die geeignet sind, einem Vielseitenbeleg (72) längs eines Förderweges zu einer Wendestation (20) zu fördern, mit einer Belegbiegevorrichtung (44), die bei Betätigung geeignet ist, mit einem an der Wendestation (20) angeordneten Beleg in Eingriff zu gehen und diesen in eine gebogene Form zu bewegen, eine Wendevorrichtung (22), die geeignet ist, mit der Oberseite (102) eines gebogenen Belegs (72) in Eingriff zu gehen, und betätigbar ist, um die Oberseite (102) in eine teilweise offene Position benachbart zu der Wendevorrichtung (22) zu bewegen, und eine Steuervorrichtung (80), die geeignet ist, die Fördervorrichtungen (32—42) zu betätigen, um den Beleg längs des Förderweges derart zu fördern, daß die Wendevorrichtung (22) mit der teilweise offenen oberen Seite (102) in Eingriff geht und diese in eine vollständig offene Position bewegt, dadurch gekennzeichnet, daß der Beleg ein Paßbuch (72) mit einem verhältnismäßig dicken Deckel und verhältnismäßig dünnen inneren Seiten ist, daß Abtastvorrichtungen (74, 76, 78), die mit der Steuervorrichtung (80) gekoppelt sind, benachbart zum Förderweg angeordnet und geeignet sind abzufühlen, ob sich das Paßbuch in einem geschlossenen oder offenen Zustand befindet, und daß die Steuervorrichtung (80) geeignet ist, die Elektromagnet-Steuerschaltung (122, 124) zu steuern, um das Antriebsplattenglied (44) mit einem verhältnismäßig hohen oder verhältnismäßig niedrigem Druckwert zu betätigen abhängig davon, ob das Paß-

buch in einem geschlossenen oder einem offenen Zustand ist.

5 2. Belegseiten-Wendegerät nach Anspruch 1, dadurch gekennzeichnet, daß die Fördervorrichtungen ein paar von Rollen (34, 40) aufweisen, das geeignet ist, mit einer Kante des Belegs (72) in Eingriff zu gehen und diese zu halten, wenn der Beleg (22) sich in der Wendestation (20) befindet.

10 3. Belegseiten-Wendegerät nach Anspruch 2, dadurch gekennzeichnet, daß die Belegbiegevorrichtung ein Antriebsplattenglied (44) aufweist, das zur Bewegung in einer Richtung senkrecht zu dem Förderweg angebracht ist.

15 4. Belegseiten-Wendegerät nach Anspruch 3, dadurch gekennzeichnet, daß das Antriebsplattenglied (44) eine durchgehend gewölbte Form aufweist.

20 5. Belegseiten-Wendegerät nach Anspruch 4, dadurch gekennzeichnet, daß das Antriebsplattenglied (44) geeignet ist, durch eine elektromagnetische Treibervorrichtung (70) betätigt zu werden, die mit dem Plattenglied (44) durch eine Gelenkverbindung mit einer Vielzahl von drehbar gelagerten Gelenkelementen (54, 56) gekoppelt ist.

25 6. Belegseiten-Wendegerät nach Anspruch 5, dadurch gekennzeichnet, daß die elektromagnetische Treibervorrichtung einen Elektromagneten aufweist, der betätigbar ist durch eine Elektromagnet-Steuerschaltung (122, 124), die geeignet ist, den durch das Antriebsplattenglied (44) auf den Beleg (72) ausgeübten Druck auswählbar zum verhältnismäßig hohen oder verhältnismäßig niedrigem Druckwert zu steuern.

30 7. Belegseiten-Wendegerät nach Anspruch 1, dadurch gekennzeichnet, daß die Wendevorrichtung eine Seitenwenderolle (22) aufweist, die drehbar ist, um die obere Seite (102) in eine teilweise offene Position zu bewegen, und durch eine mit der Steuervorrichtung (80) gekoppelte Abtastvorrichtung (104, 106), wobei die Steuervorrichtung (80) geeignet ist, wenn die obere Seite (102) um einen vorbestimmten Betrag bewegt wurde, die Deaktivierung der Belegbiegevorrichtung (44) und der Seitenwenderolle (22) zu bewirken und die Fördervorrichtungen (32—42) in Betrieb zu setzen, um den Beleg (72) längs des Förderweges zu fördern, wodurch die obere Seite (102) in die vollständig offene Position bewegt wird.

35 8. Belegseiten-Wendegerät nach Anspruch 7, dadurch gekennzeichnet, daß die Seitenwenderolle (22) steuerbar ist, um in einer Vorwärts- oder einer Rückwärtsrichtung zu drehen, und angeordnet ist zur Bewegung zwischen alternativen Positionen benachbart zum Förderweg, wodurch Seiten in einer gewählten Wenderichtung gewendet werden können.

Revendications

60 1. Appareil à tourner les pages de documents, comprenant des moyens d'avance (32, 42) conçus pour faire avancer un document (72) à plusieurs

pages le long d'un trajet d'avance vers un poste (20) de retournement, des moyens (44) de bombardement de documents conçus, lorsqu'ils sont actionnés, pour prendre un document (72), placé dans ledit poste de retournement (20), et lui donner une configuration bombée, des moyens (22) de retournement conçus pour prendre la page de dessus (102) d'un document bombé (72) et pouvant être actionnés pour amener ladite page de dessus (102) dans une position partiellement ouverte adjacente auxdits moyens de retournement (22), et des moyens de commande (80) conçus pour actionner lesdits moyens d'avance (32—42) afin de faire avancer le document le long dudit trajet d'avance de manière que lesdits moyens de retournement (22) prennent la page de dessus, partiellement ouverte (102), et l'amènent dans une position totalement ouverte, caractérisé en ce que ledit document est un livret (72) ayant une couverture relativement épaisse et des pages intérieures relativement minces, en ce que des moyens de détection (74, 76, 78) accouplés auxdits moyens de commande (80), sont prévus à proximité immédiate dudit trajet d'avance, conçus pour détecter si ledit livret est dans un état fermé ou dans un état ouvert, et en ce que lesdits moyens de commande (80) sont conçus pour commander ledit circuit (122, 124) de commande de bobine afin d'actionner ledit élément à plaque d'entraînement (44) avec un niveau de pression relativement élevé ou relativement bas selon que ledit livret est dans un état fermé ou dans un état ouvert.

2. Appareil à tourner les pages de documents selon la revendication 1, caractérisé en ce que lesdits moyens d'avance comprennent deux rouleaux (34, 40) conçus pour prendre et maintenir un bord dudit document (72) lorsque ledit document (72) est placé dans ledit poste (20) de retournement.

3. Appareil à tourner les pages de documents selon la revendication 2, caractérisé en ce que lesdits moyens de bombardement de documents comprennent un élément à plaque d'entraînement (44) monté de façon à se déplacer dans une direction perpendiculaire audit trajet d'avance.

4. Appareil à tourner les pages de documents selon la revendication 3, caractérisé en ce que

l'élément à plaque d'entraînement (44) est de forme globalement courbée.

5. Appareil à tourner les pages de documents selon la revendication 4, caractérisé en ce que ledit élément à plaque d'entraînement (44) est conçu pour être actionné par des moyens d'entraînement électromagnétiques (70) accouplés audit élément à plaque (44) par un tringlage comprenant plusieurs biellettes (54, 56) montées de façon à pouvoir tourner.

6. Appareil à tourner les pages de documents selon la revendication 5, caractérisé en ce que lesdits moyens d'entraînement électromagnétiques comprennent une bobine pouvant être actionnée par un circuit de commande de bobine (122, 124) conçu pour commander la pression exercée par ledit élément à plaque d'entraînement (44) sur ledit document (72) sélectivement audit niveau de pression relativement élevé ou relativement bas.

7. Appareil à tourner les pages de documents selon la revendication 1, caractérisé en ce que lesdits moyens de retournement comprennent un rouleau (22) à tourner les pages, pouvant être mis en rotation afin d'amener ladite page de dessus (102) dans ladite position partiellement ouverte et, par un dispositif de détection (104, 106) couplé auxdits moyens de commande (80), lesdits moyens de commande (80) étant conçus pour, lorsque ladite page de dessus (102) a été déplacée d'une distance prédéterminée, pour mettre hors d'action lesdits moyens (44) de bombardement de documents et ledit rouleau (22) à tourner les pages, et pour mettre en action lesdits moyens d'avance (32—42) afin de déplacer ledit document (72) le long dudit trajet d'avance, de manière que ladite page de dessus (102) soit amenée dans la position totalement ouverte.

8. Appareil à tourner les pages de documents selon la revendication 7, caractérisé en ce que ledit rouleau (22) à tourner les pages peut être commandé afin de tourner dans un des sens de rotation en avant ou en arrière et est monté de façon à se déplacer entre des emplacements alternés, à proximité immédiate dudit trajet d'avance, de manière que des pages puissent être tournées dans un sens choisi de retournement.

FIG. 1

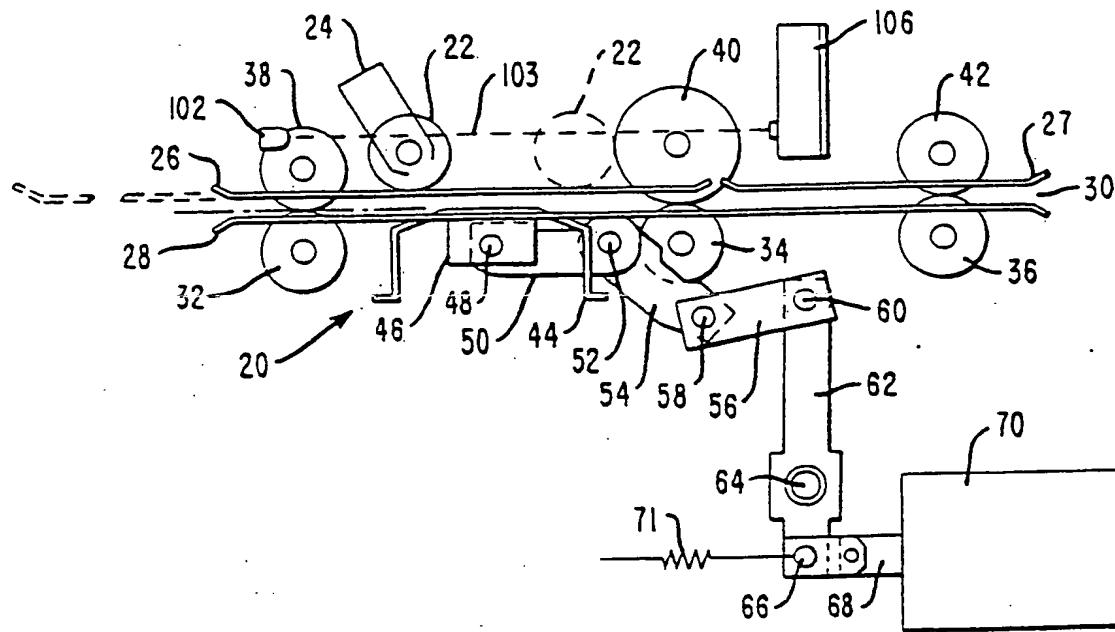


FIG. 2

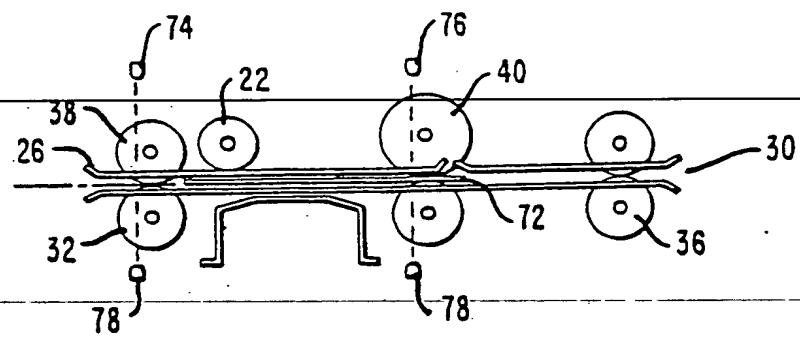


FIG. 3

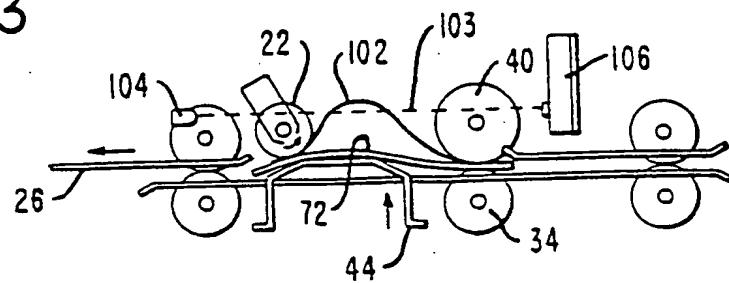


FIG. 4

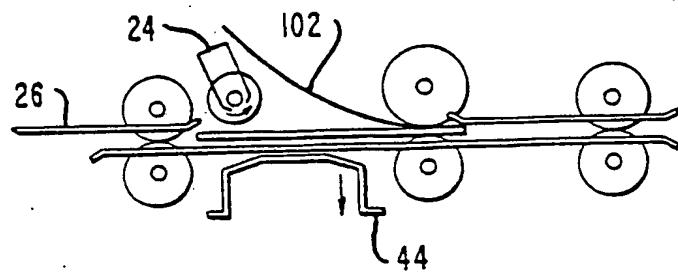


FIG. 5

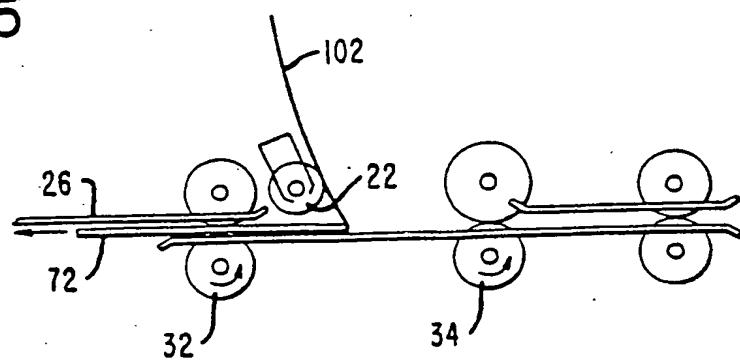


FIG. 6

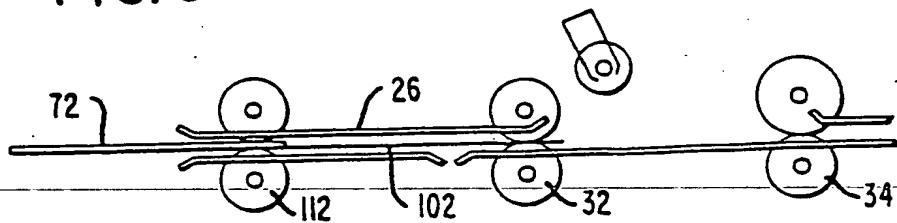
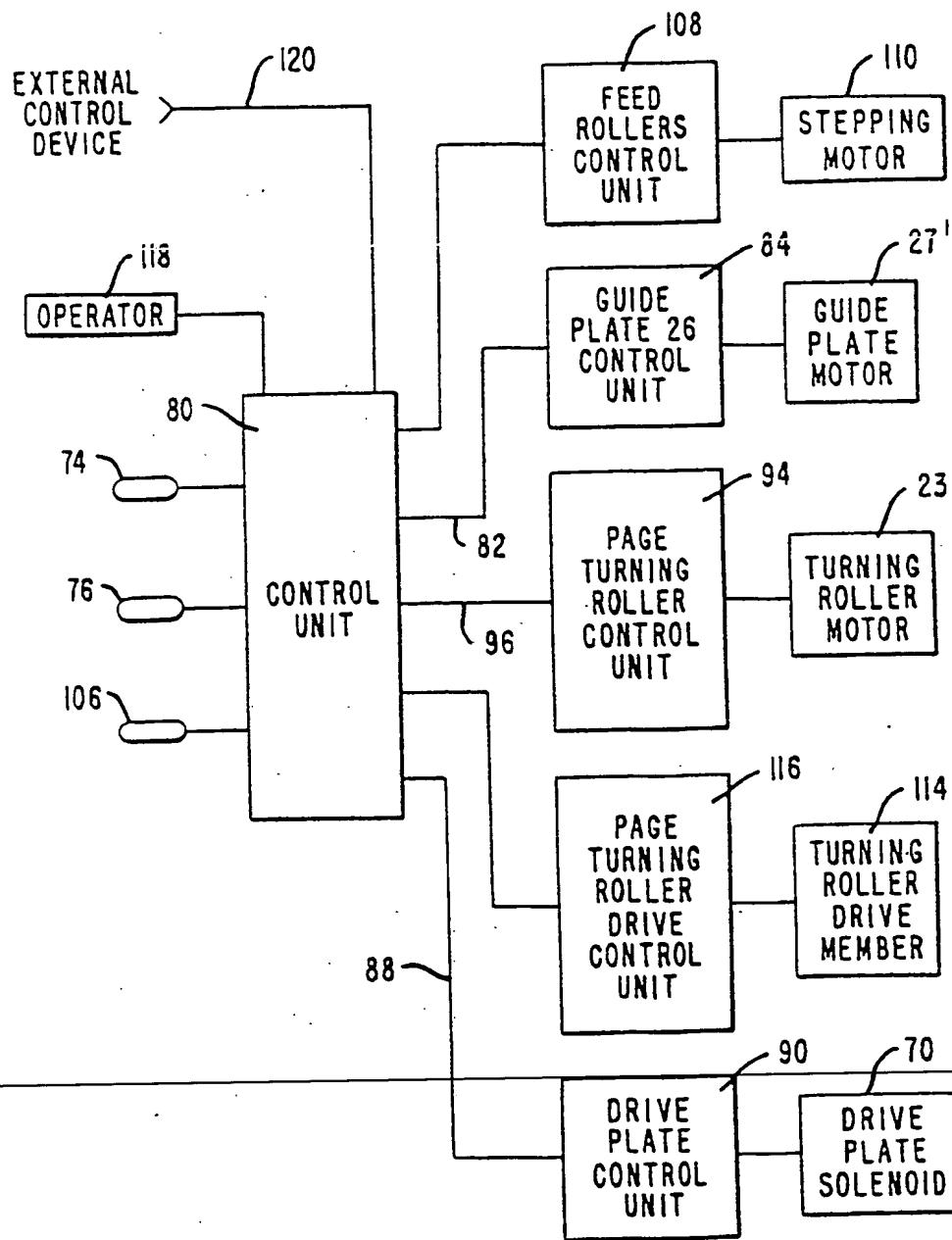


FIG. 7



8
G
E

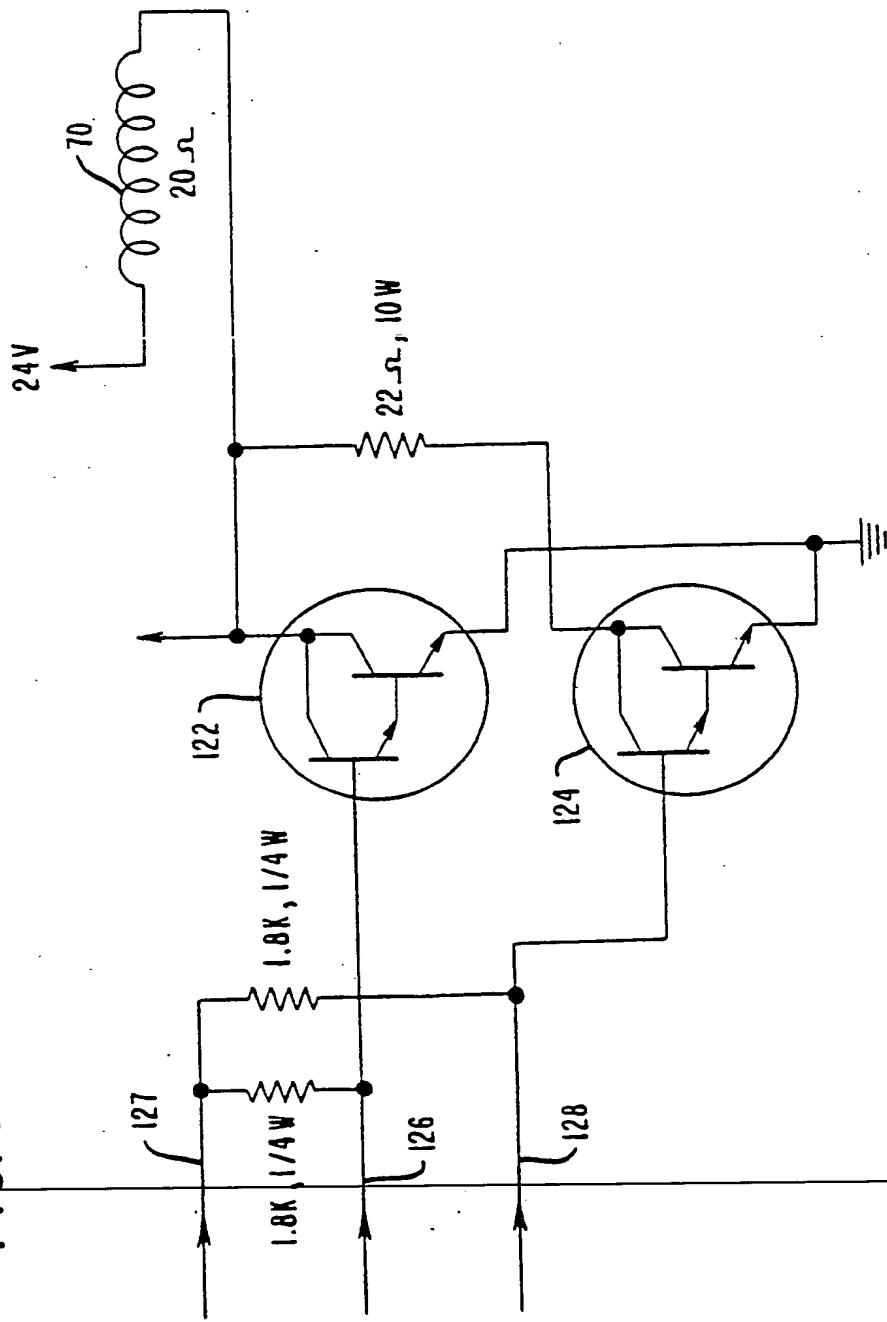
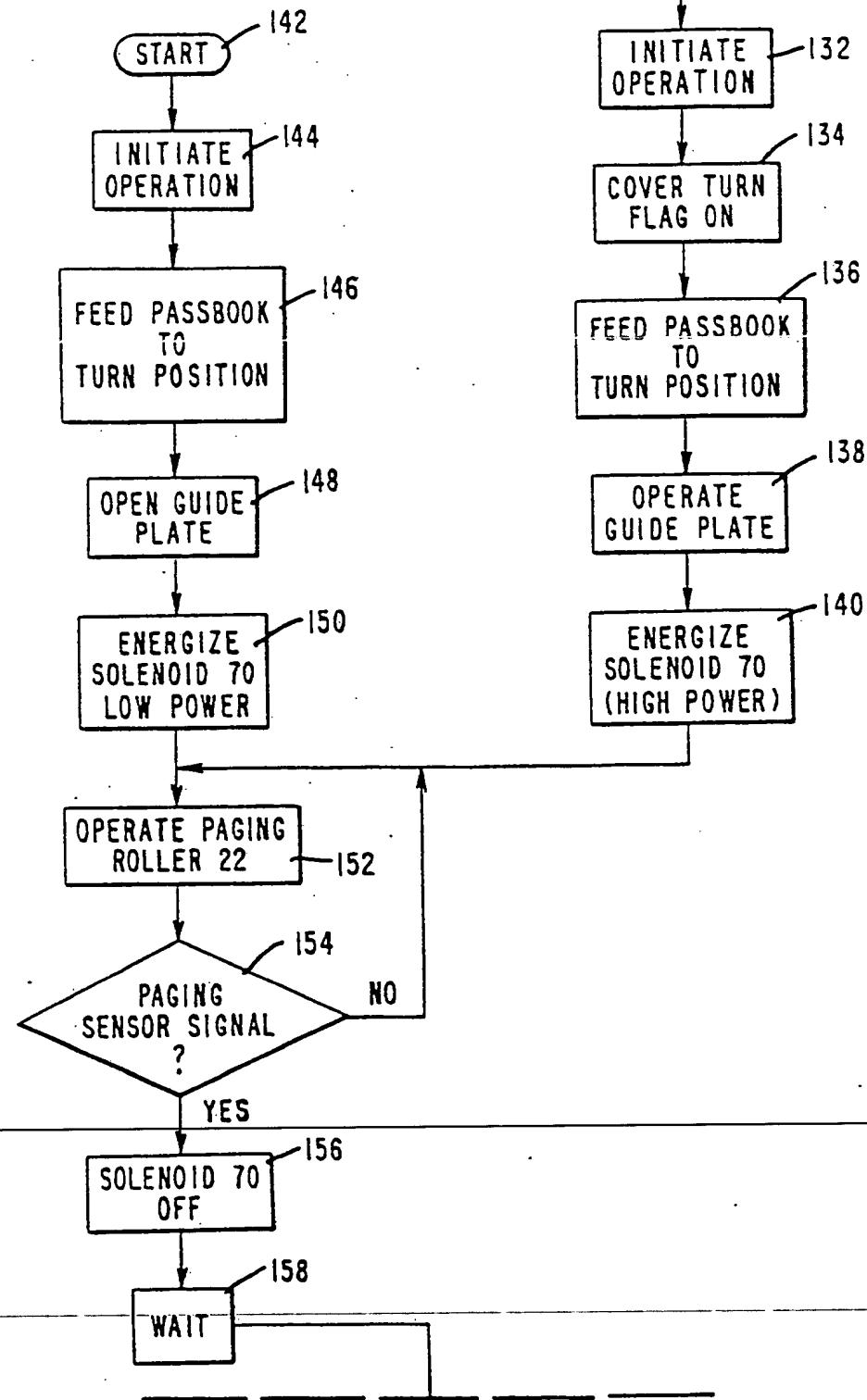


FIG. 9A



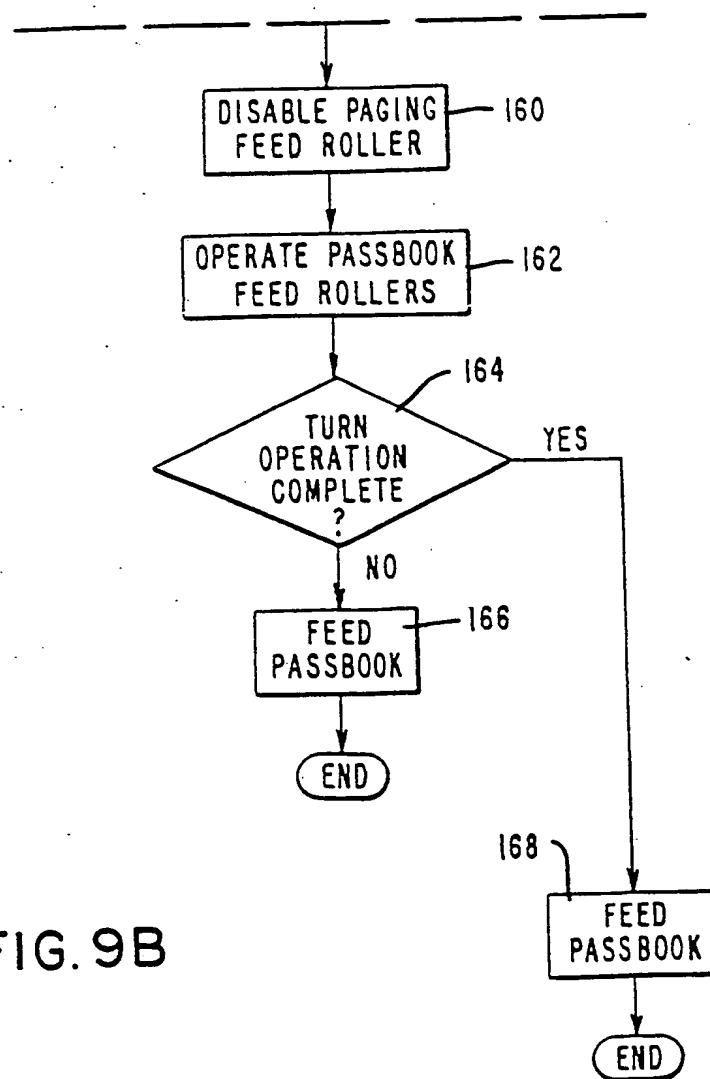


FIG. 9B

extent this information is already in Plaintiffs' possession. Brocade further objects to this Request as this jurisdiction is an improper venue for this action.

Brocade objects to this Request to the extent it seeks disclosure of any information, documents, or other tangible things that is protected by any applicable privilege or protection, including without limitation the attorney-client privilege, the attorney work product doctrine, the joint client privilege, the joint defense or common interest privilege, the constitutional right to privacy, and the Federal Rules of Civil Procedure.

Subject to and without waiving these objections, Brocade responds as follows:

For the purposes of these objections and responses, Brocade construes the term "Your" to mean only the specific entity named as a defendant in this action, Brocade Communications Systems LLC. Pursuant to the stipulation of the parties, and in the interest of proceeding with discovery despite Plaintiffs' overbroad and vague definitions, Brocade limited its response to Interrogatory number 1 to the products identified in Paragraph 64 of the Complaint (ECF No. 1). In so doing, Brocade does not concede that these products contain any SNMP Research software, including the software listed in Paragraph 33, Table 1 of the Complaint (ECF No. 1) or any other copyrighted works held by SNMP Research. Brocade will produce, on a rolling basis, non-privileged documents, to the extent such documents exist, are within Brocade's possession, custody, or control, have not already been produced, and are located after a reasonably diligent search, that are sufficient to show the information provided in Brocade's response to Interrogatory number 1.

REQUEST FOR PRODUCTION NO. 2:

All Documents Relating to SNMP Research's Interrogatory number 2, and Your answers and responses to the same.

SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 2:

Brocade incorporates its original objections to this Request served on January 25, 2021 and supplements as follows: In addition to the Preliminary Statement, General Objections, and objections to Interrogatory number 2, which are incorporated herein by reference, Brocade objects to this Request, which seeks "all" Documents "Relating to" Interrogatory number 2, as vague, ambiguous, compound, and overbroad, particularly as to SNMP's definition of "Partner Products" and "Identify," and SNMP's definitions of "Brocade" and "SNMP Research Software" that are incorporated in the definition "Partner Products," the request for "all Documents Relating to" without further specification," the overbroad time period, and the categories required to be identified in the Interrogatory. Under SNMP's definitions, Brocade is defined to include, *inter alia*, all affiliated entities, including co-defendant Broadcom Inc. SNMP Research is similarly defined to include, *inter alia*, both Plaintiffs' predecessors, agents, representatives, divisions, and subsidiaries, which are unknown to Brocade. The definition of SNMP Research Software incorporates these overbroad entity definitions, and includes software, Source Code, and Derivative Works that are beyond the scope of this lawsuit. Conducting a search for documents of such broad scope of third-party Products under SNMP's defined and undefined terms would be unduly burdensome. The Request as framed seeks information that is irrelevant and not proportional to the needs of the case. Brocade further objects to this Request as premature as it first requires review of information in SNMP's possession, including its software and/or source code. Brocade further objects to this Interrogatory as seeking premature expert discovery,

analysis, and opinion. Indeed, the problems with Interrogatory number 2 are compounded by this Request, which seeks “[a]ll Documents” “relating to” an already overbroad, vague, premature, irrelevant, and unduly burdensome interrogatory, to which Brocade only served objections.

Brocade further objects to this Request as it requires the disclosure of confidential and proprietary information of Brocade and third parties. Brocade further objects to this Request to the extent the information is not in Brocade’s possession, custody, or control and is in the possession, custody, or control of third parties. Brocade further objects to this Request to the extent this information is already in Plaintiffs’ possession. Brocade further objects to this Request as this jurisdiction is an improper venue for this action.

Brocade objects to this Request to the extent it seeks disclosure of any information, documents, or other tangible things that is protected by any applicable privilege or protection, including without limitation the attorney-client privilege, the attorney work product doctrine, the joint client privilege, the joint defense or common interest privilege, the constitutional right to privacy, and the Federal Rules of Civil Procedure.

Subject to and without waiving these objections, Brocade responds as follows:

For the purposes of these objections and responses, Brocade construes the term “Your” to mean only the specific entity named as a defendant in this action, Brocade Communications Systems LLC. Pursuant to the stipulation of the parties, and in the interest of proceeding with discovery despite Plaintiffs’ overbroad and vague definitions, Brocade limited its response to Interrogatory number 2 to the products identified in Paragraph 64 of the Complaint (ECF No. 1). In so doing, Brocade does not concede that these products contain any SNMP Research software, including the software listed in Paragraph 33, Table 1 of the Complaint (ECF No. 1) or any other copyrighted works held by SNMP Research. Brocade will produce, on a rolling basis, non-

privileged documents, to the extent such documents exist, are within Brocade's possession, custody, or control, have not already been produced, and are located after a reasonably diligent search, that are sufficient to show the information provided in Brocade's response to Interrogatory number 1 (which is applicable to Interrogatory number 2 pursuant to the parties' stipulation).

REQUEST FOR PRODUCTION NO. 3:

All Documents Relating to SNMP Research's Interrogatory number 3, and Your answers and responses to the same.

SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 3:

Brocade incorporates its original objections to this Request served on January 25, 2021 and supplements as follows: In addition to the Preliminary Statement, General Objections, and objections to Interrogatory numbers 1 through 3, which are incorporated herein by reference, vague, ambiguous, compound, and overbroad, particularly as to SNMP's definitions of "Brocade," "Products," "Partner Products," and "SNMP Research Software," "Identify," and the vague undefined terms "associated with," "SNMP Research Products," and "release numbers," and the overbroad time period. Conducting a search for documents of such broad scope under SNMP's defined and undefined terms would be unduly burdensome. This Request as framed seeks information that is irrelevant and not proportional to the needs of the case. Brocade further objects to this Request as premature as it requires review of information in SNMP's possession, including its software and/or source code. Brocade further objects to this Request as seeking premature expert discovery, analysis, and opinion. Indeed, the problems with Interrogatory number 3 are compounded by this Request, which seeks "[a]ll Documents" "relating to" an already overbroad,

vague, premature, irrelevant, and unduly burdensome interrogatory, to which Brocade only served objections.

Brocade further objects to this Request as it requires the disclosure of confidential and proprietary information of Brocade and third parties. Brocade further objects to this Request to the extent the information is not in Brocade's possession, custody, or control and is in the possession, custody, or control of third parties. Brocade further objects to this Request to the extent this information is already in Plaintiffs' possession. Brocade further objects to this Request as this jurisdiction is an improper venue for this action.

Brocade objects to this Request to the extent it seeks disclosure of any information, documents, or other tangible things that is protected by any applicable privilege or protection, including without limitation the attorney-client privilege, the attorney work product doctrine, the joint client privilege, the joint defense or common interest privilege, the constitutional right to privacy, and the Federal Rules of Civil Procedure.

Subject to and without waiving these objections, Brocade responds as follows:

For the purposes of these objections and responses, Brocade construes the term "Your" to mean only the specific entity named as a defendant in this action, Brocade Communications Systems LLC. Pursuant to the stipulation of the parties, and in the interest of proceeding with discovery despite Plaintiffs' overbroad and vague definitions, Brocade limited its response to Interrogatory number 1 to the products identified in Paragraph 64 of the Complaint (ECF No. 1). In so doing, Brocade does not concede that these products contain any SNMP Research software, including the software listed in Paragraph 33, Table 1 of the Complaint (ECF No. 1) or any other copyrighted works held by SNMP Research. Brocade will produce, on a rolling basis, non-privileged documents, to the extent such documents exist, are within Brocade's possession,

custody, or control, have not already been produced, and are located after a reasonably diligent search, that are sufficient to show the information provided in Brocade's response to Interrogatory number 3.

REQUEST FOR PRODUCTION NO. 4:

All Documents Relating to SNMP Research's Interrogatory number 4, and Your answers and responses to the same.

SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 4:

Brocade incorporates its original objections to this Request served on January 25, 2021 and supplements as follows: In addition to the Preliminary Statement, General Objections, and objections to Interrogatory numbers 1, 2, and 4, which are incorporated herein by reference, Brocade objects to this Request as vague, ambiguous, compound, cumulative, duplicative, and overbroad, particularly as to SNMP's definitions of "Brocade," "Products," "Partner Products," "SNMP Research Software," "Identify," and "Persons," the numerous undefined and vague terms in this Request, the overbroad time period, and the number and types of categories required to be identified by the Interrogatory. Conducting a search for documents of such broad scope under SNMP's defined and undefined terms would be unduly burdensome. This Request as framed seeks information that is irrelevant and not proportional to the needs of the case. Brocade further objects to this Request as premature as it requires review of information in SNMP's possession, including its software and/or source code. Brocade further objects to this Request as seeking premature expert discovery, analysis, and opinion. Indeed, the problems with Interrogatory number 4 are compounded by this Request, which seeks "[a]ll Documents" "relating to" an already overbroad,

vague, premature, irrelevant, and unduly burdensome interrogatory, to which Brocade only served objections.

Brocade further objects to this Request as it requires the disclosure of confidential and proprietary information of Brocade and third parties. Brocade further objects to this Request to the extent the information is not in Brocade's possession, custody, or control and is in the possession, custody, or control of third parties. Brocade further objects to this Request to the extent this information is already in Plaintiffs' possession. Brocade further objects to this Request as this jurisdiction is an improper venue for this action.

Brocade objects to this Request to the extent it seeks disclosure of any information, documents, or other tangible things that is protected by any applicable privilege or protection, including without limitation the attorney-client privilege, the attorney work product doctrine, the joint client privilege, the joint defense or common interest privilege, the constitutional right to privacy, and the Federal Rules of Civil Procedure.

Subject to and without waiving these objections, Brocade responds as follows:

For the purposes of these objections and responses, Brocade construes the term "Your" to mean only the specific entity named as a defendant in this action, Brocade Communications Systems LLC. Pursuant to the stipulation of the parties, and in the interest of proceeding with discovery despite Plaintiffs' overbroad and vague definitions, Brocade limited its response to Interrogatory number 1 to the products identified in Paragraph 64 of the Complaint (ECF No. 1). In so doing, Brocade does not concede that these products contain any SNMP Research software, including the software listed in Paragraph 33, Table 1 of the Complaint (ECF No. 1) or any other copyrighted works held by SNMP Research. Brocade will produce, on a rolling basis, non-privileged documents, to the extent such documents exist, are within Brocade's possession,

custody, or control, have not already been produced, and are located after a reasonably diligent search, that are sufficient to show the information provided in Brocade's response to Interrogatory number 4.

REQUEST FOR PRODUCTION NO. 5:

All Documents Relating to SNMP Research's Interrogatory number 5, and Your answers and responses to the same.

SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 5:

Brocade incorporates its original objections to this Request served on January 25, 2021 and supplements as follows: In addition to the Preliminary Statement, General Objections, and objections to Interrogatory numbers 1, 2, and 5, which are incorporated by reference herein, Brocade objects to this Request as vague, ambiguous, compound, cumulative, duplicative, and overbroad, particularly as to SNMP's definitions of "Brocade," "Product," "Partner Products," "SNMP Research Software," "Identify," "Relating to," the overbroad time period, and the number and types of categories required to be identified by the Interrogatory. Brocade also objects that this Request seeks information before the date SNMP alleges it terminated the License Agreement and after this lawsuit was filed. Conducting a search for documents of such broad scope under SNMP's defined and undefined terms would be unduly burdensome. This Request as framed seeks information that is irrelevant and not proportional to the needs of the case. Brocade further objects to this Request as premature as it requires review of information in SNMP's possession, including its software and/or source code. Brocade further objects to this Request as seeking premature expert discovery, analysis, and opinion. Indeed, the problems with Interrogatory number 5 are compounded by this Request, which seeks "[a]ll Documents" "relating to" an already overbroad,

vague, premature, irrelevant, and unduly burdensome interrogatory, to which Brocade only served objections.

Brocade further objects to this Request as it requires the disclosure of confidential and proprietary information of Brocade and third parties. Brocade further objects to this Request to the extent the information is not in Brocade's possession, custody, or control and is in the possession, custody, or control of third parties. Brocade further objects to this Request to the extent this information is already in Plaintiffs' possession. Brocade further objects to this Request as this jurisdiction is an improper venue for this action.

Brocade objects to this Request to the extent it seeks disclosure of any information, documents, or other tangible things that is protected by any applicable privilege or protection, including without limitation the attorney-client privilege, the attorney work product doctrine, the joint client privilege, the joint defense or common interest privilege, the constitutional right to privacy, and the Federal Rules of Civil Procedure.

Subject to and without waiving these objections, Brocade responds as follows:

For the purposes of these objections and responses, Brocade construes the term "Your" to mean only the specific entity named as a defendant in this action, Brocade Communications Systems LLC. Pursuant to the stipulation of the parties, and in the interest of proceeding with discovery despite Plaintiffs' overbroad and vague definitions, Brocade limited its response to Interrogatory number 1 to the products identified in Paragraph 64 of the Complaint (ECF No. 1). In so doing, Brocade does not concede that these products contain any SNMP Research software, including the software listed in Paragraph 33, Table 1 of the Complaint (ECF No. 1) or any other copyrighted works held by SNMP Research. Brocade will produce, on a rolling basis, non-privileged documents, to the extent such documents exist, are within Brocade's possession,

custody, or control, have not already been produced, and are located after a reasonably diligent search, that are sufficient to show the information provided in Brocade's response to Interrogatory number 5.

REQUEST FOR PRODUCTION NO. 6:

All Documents Relating to SNMP Research's Interrogatory number 6, and Your answers and responses to the same.

SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 6:

Brocade incorporates its original objections to this Request served on January 25, 2021 and supplements as follows: In addition to the Preliminary Statement, General Objections, and objections to Interrogatory numbers 1, 2, and 6, which are incorporated herein by this reference, Brocade objects to this Request, which seeks "all" Documents "Relating to" Interrogatory number 6, as vague, ambiguous, compound, cumulative, duplicative, and overbroad, particularly as to SNMP's definitions of "Brocade," "Product," "Partner Products," "SNMP Research Software," "Identify," and "Relating to," the request for "all Documents Relating to" without further specification, the overbroad time period, and the categories required to be identified by the Interrogatory. . Brocade also objects that this Request seeks information before the date SNMP alleges it terminated the License Agreement and after this lawsuit was filed. Conducting a search for documents of such broad scope under SNMP's defined and undefined terms would be unduly burdensome. This Request as framed seeks information that is irrelevant and not proportional to the needs of the case. Brocade further objects to this Request as premature as it requires review of information in SNMP's possession, including its software and/or source code. Brocade further objects to this Request as seeking premature expert discovery, analysis, and opinion. Indeed, the

problems with Interrogatory number 6 are compounded by this Request, which seeks “[a]ll Documents” “relating to” an already overbroad, vague, premature, irrelevant, and unduly burdensome interrogatory, to which Brocade only served objections.

Brocade further objects to this Request as it requires the disclosure of confidential and proprietary information of Brocade and third parties. Brocade further objects to this Request to the extent the information is not in Brocade’s possession, custody, or control and is in the possession, custody, or control of third parties. Brocade further objects to this Request to the extent this information is already in Plaintiffs’ possession.

Brocade further objects to this Request as this jurisdiction is an improper venue for this action.

Brocade objects to this Request to the extent it seeks disclosure of any information, documents, or other tangible things that is protected by any applicable privilege or protection, including without limitation the attorney-client privilege, the attorney work product doctrine, the joint client privilege, the joint defense or common interest privilege, the constitutional right to privacy, and the Federal Rules of Civil Procedure.

Subject to and without waiving these objections, Brocade responds as follows:

For the purposes of these objections and responses, Brocade construes the term “Your” to mean only the specific entity named as a defendant in this action, Brocade Communications Systems LLC. Pursuant to the stipulation of the parties, and in the interest of proceeding with discovery despite Plaintiffs’ overbroad and vague definitions, Brocade limited its response to Interrogatory number 1 to the products identified in Paragraph 64 of the Complaint (ECF No. 1). In so doing, Brocade does not concede that these products contain any SNMP Research software, including the software listed in Paragraph 33, Table 1 of the Complaint (ECF No. 1) or any other

copyrighted works held by SNMP Research. Brocade will produce, on a rolling basis, non-privileged documents, to the extent such documents exist, are within Brocade's possession, custody, or control, have not already been produced, and are located after a reasonably diligent search, that are sufficient to show the information provided in Brocade's response to Interrogatory number 6.

REQUEST FOR PRODUCTION NO. 7:

All Documents Relating to SNMP Research's Interrogatory number 7, and Your answers and responses to the same.

SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 7:

Brocade incorporates its original objections to this Request served on January 25, 2021 and supplements as follows: In addition to the Preliminary Statement, General Objections, and objections to Interrogatory number 7, which are incorporated herein by this reference, Brocade objects to this Request, which seeks "all" Documents "Relating to" Interrogatory number 7, as vague, ambiguous, compound, and overbroad, particularly as to SNMP's definition of "Brocade," "Product," "SNMP Research Software," "Person," "Identify," and "relating to," the vague term "associated with," the request for "all Documents Relating to" without further specification, the overbroad time period, the undefined and vague terms in this Interrogatory (including "involved in any search for" and "software system"), and the number and types of categories required to be identified by the Interrogatory. Conducting a search for documents of such broad scope under SNMP's defined and undefined terms would be unduly burdensome. This Request as framed seeks information that is irrelevant and not proportional to the needs of the case. Brocade further objects to this Request as premature as it requires review of information in SNMP's possession, including

its software and/or source code. Brocade further objects to this Request as seeking premature expert discovery, analysis, and opinion. Indeed, the problems with Interrogatory number 7 are compounded by this Request, which seeks “[a]ll Documents” “relating to” an already overbroad, vague, premature, irrelevant, and unduly burdensome interrogatory, to which Brocade only served objections.

Brocade further objects to this Request as it requires the disclosure of confidential and proprietary information of Brocade and third parties. Brocade further objects to this Request to the extent the information is not in Brocade’s possession, custody, or control and is in the possession, custody, or control of third parties. Brocade further objects to this Request to the extent this information is already in Plaintiffs’ possession. Brocade further objects to this Request as this jurisdiction is an improper venue for this action.

Brocade objects to this Request to the extent it seeks disclosure of any information, documents, or other tangible things that is protected by any applicable privilege or protection, including without limitation the attorney-client privilege, the attorney work product doctrine, the joint client privilege, the joint defense or common interest privilege, the constitutional right to privacy, and the Federal Rules of Civil Procedure.

Subject to and without waiving these objections, Brocade responds as follows:

For the purposes of these objections and responses, Brocade construes the term “Your” to mean only the specific entity named as a defendant in this action, Brocade Communications Systems LLC. Pursuant to the stipulation of the parties, and in the interest of proceeding with discovery despite Plaintiffs’ overbroad and vague definitions, Brocade limited its response to Interrogatory number 1 to the products identified in Paragraph 64 of the Complaint (ECF No. 1). In so doing, Brocade does not concede that these products contain any SNMP Research software,

including the software listed in Paragraph 33, Table 1 of the Complaint (ECF No. 1) or any other copyrighted works held by SNMP Research. No persons were identified in response to Interrogatory number 7.

REQUEST FOR PRODUCTION NO. 8:

All Documents Relating to SNMP Research's Interrogatory number 8, and Your answers and responses to the same.

SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 8:

Brocade incorporates its original objections to this Request served on January 25, 2021 and supplements as follows: In addition to the Preliminary Statement, General Objections, and objections to Interrogatory number 8, which are incorporated herein by reference, Brocade objects to this Request, which seeks "all" Documents "Relating to" Interrogatory number 7, as vague, ambiguous, compound, and overbroad, particularly as to SNMP's definition of "Brocade," "Products," "Identify," "SNMP Research Software," "Relating to," the request for "all internal Communications" concerning "any discussion or Communication whatsoever," and the request for "all Documents Relating to" without further specification, the overbroad time period, and the categories required to be identified by the Interrogatory. Conducting a search for documents of such broad scope under SNMP's defined and undefined terms would be unduly burdensome. This Request as framed seeks information that is irrelevant and not proportional to the needs of the case. Brocade further objects to this Request as premature as it requires review of information in SNMP's possession, including its software and/or source code. Brocade further objects to this Request as seeking premature expert discovery, analysis, and opinion. Indeed, the problems with Interrogatory number 8 are compounded by this Request, which seeks "[a]ll Documents" "relating

to" an already overbroad, vague, premature, irrelevant, and unduly burdensome interrogatory, to which Brocade only served objections.

Brocade further objects to this Request as it requires the disclosure of confidential and proprietary information of Brocade and third parties. Brocade further objects to this Request to the extent the information is not in Brocade's possession, custody, or control and is in the possession, custody, or control of third parties. Brocade further objects to this Request to the extent this information is already in Plaintiffs' possession. Brocade further objects to this Request as this jurisdiction is an improper venue for this action.

Brocade objects to this Request to the extent it seeks disclosure of any information, documents, or other tangible things that is protected by any applicable privilege or protection, including without limitation the attorney-client privilege, the attorney work product doctrine, the joint client privilege, the joint defense or common interest privilege, the constitutional right to privacy, and the Federal Rules of Civil Procedure.

Subject to and without waiving these objections, Brocade responds as follows:

For the purposes of these objections and responses, Brocade construes the term "Your" to mean only the specific entity named as a defendant in this action, Brocade Communications Systems LLC. Pursuant to the stipulation of the parties, and in the interest of proceeding with discovery despite Plaintiffs' overbroad and vague definitions, Brocade limited its response to Interrogatory number 1 to the products identified in Paragraph 64 of the Complaint (ECF No. 1). In so doing, Brocade does not concede that these products contain any SNMP Research software, including the software listed in Paragraph 33, Table 1 of the Complaint (ECF No. 1) or any other copyrighted works held by SNMP Research. Brocade will produce, on a rolling basis, non-privileged documents, to the extent such documents exist, are within Brocade's possession,

custody, or control, have not already been produced, and are located after a reasonably diligent search, that are sufficient to show the information provided in Brocade's response to Interrogatory number 8.

REQUEST FOR PRODUCTION NO. 9:

All Documents Relating to SNMP Research's Interrogatory number 9, and Your answers and responses to the same.

SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 9:

Brocade incorporates its original objections to this Request served on January 25, 2021 and supplements as follows: In addition to the Preliminary Statement, General Objections, and objections to Interrogatory numbers 1, 2, and 9, which are incorporated herein by reference, Brocade objects to this Request, which seeks "all" Documents "Relating to" Interrogatory number 9, as vague, ambiguous, compound, and overbroad, particularly as to SNMP's definition of "Brocade," "Product," "Partner Products," "SNMP Research Software," "Identify," and "Relating to," the request for "all Documents Relating to" without further specification, the overbroad time period, and the categories required to be identified by the Interrogatory. Conducting a search for documents of such broad scope under SNMP's defined and undefined terms would be unduly burdensome. This Request as framed seeks information that is irrelevant and not proportional to the needs of the case. Brocade further objects to this Request as premature as it first requires review of information in SNMP's possession, including its software and/or source code. Brocade further objects to this Request as seeking premature expert discovery, analysis, and opinion. Indeed, the problems with Interrogatory number 9 are compounded by this Request, which seeks

“[a]ll Documents” “relating to” an already overbroad, vague, premature, irrelevant, and unduly burdensome interrogatory, to which Brocade only served objections.

Brocade further objects to this Request as it requires the disclosure of confidential and proprietary information of Brocade and third parties. Brocade further objects to this Request to the extent the information is not in Brocade’s possession, custody, or control and is in the possession, custody, or control of third parties. Brocade further objects to this Request to the extent this information is already in Plaintiffs’ possession. Brocade further objects to this Request as this jurisdiction is an improper venue for this action.

Brocade objects to this Request to the extent it seeks disclosure of any information, documents, or other tangible things that is protected by any applicable privilege or protection, including without limitation the attorney-client privilege, the attorney work product doctrine, the joint client privilege, the joint defense or common interest privilege, the constitutional right to privacy, and the Federal Rules of Civil Procedure.

Subject to and without waiving these objections, Brocade responds as follows:

For the purposes of these objections and responses, Brocade construes the term “Your” to mean only the specific entity named as a defendant in this action, Brocade Communications Systems LLC. Pursuant to the stipulation of the parties, and in the interest of proceeding with discovery despite Plaintiffs’ overbroad and vague definitions, Brocade limited its response to Interrogatory number 1 to the products identified in Paragraph 64 of the Complaint (ECF No. 1). In so doing, Brocade does not concede that these products contain any SNMP Research software, including the software listed in Paragraph 33, Table 1 of the Complaint (ECF No. 1) or any other copyrighted works held by SNMP Research. Brocade will produce, on a rolling basis, non-privileged documents, to the extent such documents exist, are within Brocade’s possession,

custody, or control, have not already been produced, and are located after a reasonably diligent search, that are sufficient to show the information provided in Brocade's response to Interrogatory number 9.

REQUEST FOR PRODUCTION NO. 10:

All Documents Relating to SNMP Research's Interrogatory number 10, and Your answers and responses to the same.

SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 10:

Brocade incorporates its original objections to this Request served on January 25, 2021 and supplements as follows: In addition to the Preliminary Statement, General Objections, and objections to Interrogatory numbers 1, 2, and 10, which are incorporated herein by reference, Brocade objects to this Request, which seeks "all" Documents "Relating to" Interrogatory number 10, as vague, ambiguous, compound, and overbroad, particularly as to SNMP's definition of "Brocade," "Product," "Partner Products," "SNMP Research Software," "Identify," the other undefined and vague and overbroad terms in Interrogatory number 10 (including "third-party seller or reseller of each version, release, software or firmware release, and iteration of every Product"), and "Relating to," the request for "all Documents Relating to" without further specification, the overbroad time period, and the categories required to be identified by the Interrogatory. Conducting a search for documents of such broad scope under SNMP's defined and undefined terms would be unduly burdensome. This Request as framed seeks information that is irrelevant and not proportional to the needs of the case. Brocade further objects to this Request as premature as it first requires review of information in SNMP's possession, including its software and/or source code. Brocade further objects to this Request as seeking premature expert discovery,

analysis, and opinion. Indeed, the problems with Interrogatory number 10 are compounded by this Request, which seeks “[a]ll Documents” “relating to” an already overbroad, vague, premature, irrelevant, and unduly burdensome interrogatory, to which Brocade only served objections.

Brocade further objects to this Request as it requires the disclosure of confidential and proprietary information of Brocade and third parties. Brocade further objects to this Request to the extent the information is not in Brocade’s possession, custody, or control and is in the possession, custody, or control of third parties. Brocade further objects to this Request to the extent this information is already in Plaintiffs’ possession. Brocade further objects to this Request as this jurisdiction is an improper venue for this action.

Brocade objects to this Request to the extent it seeks disclosure of any information, documents, or other tangible things that is protected by any applicable privilege or protection, including without limitation the attorney-client privilege, the attorney work product doctrine, the joint client privilege, the joint defense or common interest privilege, the constitutional right to privacy, and the Federal Rules of Civil Procedure.

Subject to and without waiving these objections, Brocade responds as follows:

For the purposes of these objections and responses, Brocade construes the term “Your” to mean only the specific entity named as a defendant in this action, Brocade Communications Systems LLC. Pursuant to the stipulation of the parties, and in the interest of proceeding with discovery despite Plaintiffs’ overbroad and vague definitions, Brocade limited its response to Interrogatory number 1 to the products identified in Paragraph 64 of the Complaint (ECF No. 1). In so doing, Brocade does not concede that these products contain any SNMP Research software, including the software listed in Paragraph 33, Table 1 of the Complaint (ECF No. 1) or any other copyrighted works held by SNMP Research. As indicated in Brocade’s response to Interrogatory

number 10, Brocade is willing to meet and confer regarding the meaning and scope of Interrogatory number 10 and documents related thereto.

REQUEST FOR PRODUCTION NO. 11:

All Documents Relating to SNMP Research's Interrogatory number 11, and Your answers and responses to the same.

SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 11:

Brocade incorporates its original objections to this Request served on January 25, 2021 and supplements as follows: In addition to the Preliminary Statement, General Objections, and objections to Interrogatory numbers 1 and 11, which are incorporated herein by reference, Brocade objects to this Request, which seeks "all" Documents "Relating to" Interrogatory number 11, as vague, ambiguous, compound, and overbroad, particularly as to SNMP's definition of "Brocade," "Product," "Identify," "SNMP Research Software," "Extreme," "Relating to," the undefined and vague terms in Interrogatory number 11 (including "transferred, or otherwise disclosed to," "material code," and "material description"), the request for "all Documents Relating to" without further specification, the overbroad time period, and the categories required to be identified by the Interrogatory. Conducting a search for documents of such broad scope under SNMP's defined and undefined terms would be unduly burdensome. This Request as framed seeks information that is irrelevant and not proportional to the needs of the case. Brocade further objects to this Request as premature as it first requires review of information in SNMP's possession, including its software and/or source code. Brocade further objects to this Request as seeking premature expert discovery, analysis, and opinion. Indeed, the problems with Interrogatory number 11 are compounded by this

Request, which seeks “[a]ll Documents” “relating to” an already overbroad, vague, premature, irrelevant, and unduly burdensome interrogatory, to which Brocade only served objections.

Brocade further objects to this Request as it requires the disclosure of confidential and proprietary information of Brocade and third parties. Brocade further objects to this Request to the extent the information is not in Brocade’s possession, custody, or control and is in the possession, custody, or control of third parties. Brocade further objects to this Request to the extent this information is already in Plaintiffs’ possession. Brocade further objects to this Request as this jurisdiction is an improper venue for this action.

Brocade objects to this Request to the extent it seeks disclosure of any information, documents, or other tangible things that is protected by any applicable privilege or protection, including without limitation the attorney-client privilege, the attorney work product doctrine, the joint client privilege, the joint defense or common interest privilege, the constitutional right to privacy, and the Federal Rules of Civil Procedure.

Subject to and without waiving these objections, Brocade responds as follows:

For the purposes of these objections and responses, Brocade construes the term “Your” to mean only the specific entity named as a defendant in this action, Brocade Communications Systems LLC. Pursuant to the stipulation of the parties, and in the interest of proceeding with discovery despite Plaintiffs’ overbroad and vague definitions, Brocade limited its response to Interrogatory number 1 to the products identified in Paragraph 64 of the Complaint (ECF No. 1). In so doing, Brocade does not concede that these products contain any SNMP Research software, including the software listed in Paragraph 33, Table 1 of the Complaint (ECF No. 1) or any other copyrighted works held by SNMP Research. No products were identified in response to Interrogatory number 11.

REQUEST FOR PRODUCTION NO. 12:

All Documents Relating to SNMP Research's Interrogatory number 12, and Your answers and responses to the same.

SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 12:

Brocade incorporates its original objections to this Request served on January 25, 2021 and supplements as follows: In addition to the Preliminary Statement, General Objections, and objections to Interrogatory numbers 1, 2, and 12, which are incorporated herein by reference, Brocade objects to this Request, which seeks "all" Documents "Relating to" Interrogatory number 12, as vague, ambiguous, compound, and overbroad, particularly as to SNMP's definition of "Brocade," "Products," "Identify," "SNMP Research Software," "Relating to," the other undefined and vague terms in Interrogatory No. 12 (including "transferred" and "provided"), the overbroad time period, the request for "all Documents Relating to" without further specification, the overbroad time period, and the categories required to be identified. Conducting a search for documents of such broad scope under SNMP's defined and undefined terms would be unduly burdensome. This Request as framed seeks information that is irrelevant and not proportional to the needs of the case. Brocade further objects to this Request as premature as it first requires review of information in SNMP's possession, including its software and/or source code. Brocade further objects to this Request as seeking premature expert discovery, analysis, and opinion. Indeed, the problems with Interrogatory number 12 are compounded by this Request, which seeks "[a]ll Documents" "relating to" an already overbroad, vague, premature, irrelevant, and unduly burdensome interrogatory, to which Brocade only served objections.

Brocade further objects to this Request as it requires the disclosure of confidential and proprietary information of Brocade and third parties. Brocade further objects to this Request to the extent the information is not in Brocade's possession, custody, or control and is in the possession, custody, or control of third parties. Brocade further objects to this Request to the extent this information is already in Plaintiffs' possession. Brocade further objects to this Request as this jurisdiction is an improper venue for this action.

Brocade objects to this Request to the extent it seeks disclosure of any information, documents, or other tangible things that is protected by any applicable privilege or protection, including without limitation the attorney-client privilege, the attorney work product doctrine, the joint client privilege, the joint defense or common interest privilege, the constitutional right to privacy, and the Federal Rules of Civil Procedure.

Subject to and without waiving these objections, Brocade responds as follows:

For the purposes of these objections and responses, Brocade construes the term "Your" to mean only the specific entity named as a defendant in this action, Brocade Communications Systems LLC. Pursuant to the stipulation of the parties, and in the interest of proceeding with discovery despite Plaintiffs' overbroad and vague definitions, Brocade limited its response to Interrogatory number 1 to the products identified in Paragraph 64 of the Complaint (ECF No. 1). In so doing, Brocade does not concede that these products contain any SNMP Research software, including the software listed in Paragraph 33, Table 1 of the Complaint (ECF No. 1) or any other copyrighted works held by SNMP Research. As indicated in Brocade's response to Interrogatory number 12, Brocade is willing to meet and confer regarding the meaning and scope of Interrogatory number 12 and documents related thereto.

REQUEST FOR PRODUCTION NO. 13:

All Documents Relating to SNMP Research's Interrogatory number 13, and Your answers and responses to the same.

SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 13:

Brocade incorporates its original objections to this Request served on January 25, 2021 and supplements as follows: In addition to the Preliminary Statement, General Objections, and objections to Interrogatory number 13, which are incorporated herein by reference, Brocade objects to this Request, which seeks "all" Documents "Relating to" Interrogatory number 13, as vague, ambiguous, compound, and overbroad, particularly as to SNMP's definition of "Brocade," "Products," "Identify," "SNMP Research Software," and "Relating to," the request for "all Documents Relating to" without further specification, and the overbroad time period. Interrogatory number 13 is nonsensical because SNMP has defined Brocade to include Broadcom and vice versa, as well as all other affiliated entities and more. SNMP Research Software is similarly broadly defined to include individuals and entities unknown to Brocade and to include software beyond the scope of this lawsuit. Conducting a search for documents of such broad scope under SNMP's defined and undefined terms would be unduly burdensome. This Request as framed seeks information that is irrelevant and not proportional to the needs of the case. Brocade further objects to this Request as premature as it first requires review of information in SNMP's possession, including its related entities, affiliates, predecessors, employees, software and/or source code. Brocade further objects to this Request as seeking premature expert discovery, analysis, and opinion. Indeed, the problems with Interrogatory number 13 are compounded by this Request, which seeks "[a]ll Documents" "relating to" an already overbroad, vague, premature, irrelevant, and unduly burdensome interrogatory, to which Brocade only served objections.

Brocade further objects to this Request as it requires the disclosure of confidential and proprietary information of Brocade and third parties. Brocade further objects to this Request to the extent the information is not in Brocade's possession, custody, or control and is in the possession, custody, or control of third parties. Brocade further objects to this Request to the extent this information is already in Plaintiffs' possession. Brocade further objects to this Request as this jurisdiction is an improper venue for this action.

Brocade objects to this Request to the extent it seeks disclosure of any information, documents, or other tangible things that is protected by any applicable privilege or protection, including without limitation the attorney-client privilege, the attorney work product doctrine, the joint client privilege, the joint defense or common interest privilege, the constitutional right to privacy, and the Federal Rules of Civil Procedure.

Subject to and without waiving these objections, Brocade responds as follows:

For the purposes of these objections and responses, Brocade construes the term "Your" to mean only the specific entity named as a defendant in this action, Brocade Communications Systems LLC. Pursuant to the stipulation of the parties, and in the interest of proceeding with discovery despite Plaintiffs' overbroad and vague definitions, Brocade limited its response to Interrogatory number 1 to the products identified in Paragraph 64 of the Complaint (ECF No. 1). In so doing, Brocade does not concede that these products contain any SNMP Research software, including the software listed in Paragraph 33, Table 1 of the Complaint (ECF No. 1) or any other copyrighted works held by SNMP Research. No contracts were identified in response to Interrogatory number 13.

REQUEST FOR PRODUCTION NO. 14:

All Documents Relating to SNMP Research's Interrogatory number 14, and Your answers and responses to the same.

SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 14:

Brocade incorporates its original objections to this Request served on January 25, 2021 and supplements as follows: In addition to the Preliminary Statement, General Objections, and objections to Interrogatory number 14, which are incorporated herein by reference, Brocade objects to this Request, which seeks "all" Documents "Relating to" Interrogatory number 14, as vague, ambiguous, compound, and overbroad, particularly as to SNMP's definition of "Brocade," "Products," "Extreme," "Identify," "SNMP Research Software," the other vague and undefined terms in Interrogatory number 14 (including "purchase price allocation" and "financial interests" and "in connection with the transfer" and "disclosure" and "or otherwise" and "was/is" and "direct and indirect profits"), and "Relating to," the request for "all Documents Relating to" without further specification, the overbroad time period, and the categories required to be identified by the Interrogatory. Brocade also object that Interrogatory number 14 is unintelligible as it seeks "the date" of Brocade's profits and other financial information. Brocade objects that Interrogatory number 14 assumes facts that have not been proven by SNMP. Conducting a search for documents of such broad scope under SNMP's defined and undefined terms would be unduly burdensome. This Request as framed seeks information that is irrelevant and not proportional to the needs of the case. Brocade further objects to this Request as premature as it first requires review of information in SNMP's possession, including its related entities, affiliates, predecessors, employees, software and/or source code. Brocade further objects to this Request as seeking premature expert discovery, analysis, and opinion. Indeed, the problems with Interrogatory

number 14 are compounded by this Request, which seeks “[a]ll Documents” “relating to” an already overbroad, vague, premature, irrelevant, and unduly burdensome interrogatory, to which Brocade only served objections.

Brocade further objects to this Request as it requires the disclosure of confidential and proprietary information of Brocade and third parties. Brocade further objects to this Request to the extent the information is not in Brocade’s possession, custody, or control and is in the possession, custody, or control of third parties. Brocade further objects to this Request to the extent this information is already in Plaintiffs’ possession. Brocade further objects to this Request as this jurisdiction is an improper venue for this action.

Brocade objects to this Request to the extent it seeks disclosure of any information, documents, or other tangible things that is protected by any applicable privilege or protection, including without limitation the attorney-client privilege, the attorney work product doctrine, the joint client privilege, the joint defense or common interest privilege, the constitutional right to privacy, and the Federal Rules of Civil Procedure.

Subject to and without waiving these objections, Brocade responds as follows:

For the purposes of these objections and responses, Brocade construes the term “Your” to mean only the specific entity named as a defendant in this action, Brocade Communications Systems LLC. Pursuant to the stipulation of the parties, and in the interest of proceeding with discovery despite Plaintiffs’ overbroad and vague definitions, Brocade limited its response to Interrogatory number 1 to the products identified in Paragraph 64 of the Complaint (ECF No. 1). In so doing, Brocade does not concede that these products contain any SNMP Research software, including the software listed in Paragraph 33, Table 1 of the Complaint (ECF No. 1) or any other copyrighted works held by SNMP Research. Brocade will produce, on a rolling basis, non-

privileged documents, to the extent such documents exist, are within Brocade's possession, custody, or control, have not already been produced, and are located after a reasonably diligent search, that are sufficient to show the information provided in Brocade's response to Interrogatory number 14.

REQUEST FOR PRODUCTION NO. 15:

All Documents Relating to SNMP Research's Interrogatory number 15, and Your answers and responses to the same.

SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 15:

Brocade incorporates its original objections to this Request served on January 25, 2021 and supplements as follows: In addition to the Preliminary Statement, General Objections, and objections to Interrogatory number 15, which are incorporated herein by reference, Brocade objects to this Request, which seeks "all" Documents "Relating to" Interrogatory number 15, as vague, ambiguous, compound, and overbroad, particularly as to SNMP's definition of "Brocade," "Products," "Identify," "SNMP Research Software," "Extreme," the other vague and undefined terms in Interrogatory number 15 (including "involvement in the transfer" and "disclosure" and "or otherwise" and "was/is" and "duration of Broadcom's involvement"), and "Relating to," the request for "all Documents Relating to" without further specification, the overbroad time period, and the categories required to be identified by the Interrogatory. Interrogatory number 15 is nonsensical because SNMP has defined Brocade to include Broadcom and vice versa, as well as all other affiliated entities and more. SNMP Research Software is similarly broadly defined to include individuals and entities unknown to Brocade and to include software beyond the scope of this lawsuit. Brocade objects that Interrogatory number 15 assumes facts that have not been proven

by SNMP. Conducting a search for documents of such broad scope under SNMP's defined and undefined terms would be unduly burdensome. This Request as framed seeks information that is irrelevant and not proportional to the needs of the case. Brocade further objects to this Request as premature as it first requires review of information in SNMP's possession, including its related entities, affiliates, predecessors, employees, software and/or source code. Brocade further objects to this Request as seeking premature expert discovery, analysis, and opinion. Indeed, the problems with Interrogatory number 15 are compounded by this Request, which seeks “[a]ll Documents” “relating to” an already overbroad, vague, premature, irrelevant, and unduly burdensome interrogatory, to which Brocade only served objections. Brocade further objects to this Request as duplicative and cumulative of Request for Production Nos. 18 and 57.

Brocade further objects to this Request as it requires the disclosure of confidential and proprietary information of Brocade and third parties. Brocade further objects to this Request to the extent the information is not in Brocade's possession, custody, or control and is in the possession, custody, or control of third parties. Brocade further objects to this Request to the extent this information is already in Plaintiffs' possession. Brocade further objects to this Request as this jurisdiction is an improper venue for this action.

Brocade objects to this Request to the extent it seeks disclosure of any information, documents, or other tangible things that is protected by any applicable privilege or protection, including without limitation the attorney-client privilege, the attorney work product doctrine, the joint client privilege, the joint defense or common interest privilege, the constitutional right to privacy, and the Federal Rules of Civil Procedure.

Subject to and without waiving these objections, Brocade responds as follows:

For the purposes of these objections and responses, Brocade construes the term “Your” to mean only the specific entity named as a defendant in this action, Brocade Communications Systems LLC. Pursuant to the stipulation of the parties, and in the interest of proceeding with discovery despite Plaintiffs’ overbroad and vague definitions, Brocade limited its response to Interrogatory number 1 to the products identified in Paragraph 64 of the Complaint (ECF No. 1). In so doing, Brocade does not concede that these products contain any SNMP Research software, including the software listed in Paragraph 33, Table 1 of the Complaint (ECF No. 1) or any other copyrighted works held by SNMP Research. Brocade does not identify any Broadcom involvement in response to Interrogatory number 15.

REQUEST FOR PRODUCTION NO. 16:

All Documents Relating to SNMP Research’s Interrogatory number 16, and Your answers and responses to the same.

SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 16:

Brocade incorporates its original objections to this Request served on January 25, 2021 and supplements as follows: In addition to the Preliminary Statement, General Objections, and objections to Interrogatory number 16, which are incorporated herein by reference, Brocade objects to this Request, which seeks “all” Documents “Relating to” Interrogatory number 16, as vague, ambiguous, compound, and overbroad, particularly as to SNMP’s definition of “Brocade,” “Products,” “Identify,” “SNMP Research Software,” other vague and ambiguous terms in this Interrogatory (including “Describe” and “Broadcom’s involvement” and “production, disclosure, transfer, licensing, distribution, and/or creation” and “duration of Broadcom’s involvement”), and “Relating to,” the request for “all Documents Relating to” without further specification, the

overbroad time period, and the categories required to be identified by the Interrogatory. Under these definitions, Interrogatory number 16 is nonsensical, because SNMP has defined “Broadcom” to include “Brocade.” SNMP Research Software is similarly broadly defined to include individuals and entities unknown to Brocade and to include software beyond the scope of this lawsuit. Brocade objects that Interrogatory number 16 assumes facts that have not been proven by SNMP. Conducting a search for documents of such broad scope under SNMP’s defined and undefined terms would be unduly burdensome. This Request as framed seeks information that is irrelevant and not proportional to the needs of the case. Brocade further objects to this Request as premature as it first requires review of information in SNMP’s possession, including its related entities, affiliates, predecessors, employees, software and/or source code. Brocade further objects to this Request as seeking premature expert discovery, analysis, and opinion. Indeed, the problems with Interrogatory number 16 are compounded by this Request, which seeks “[a]ll Documents” “relating to” an already overbroad, vague, premature, irrelevant, and unduly burdensome interrogatory, to which Brocade only served objections. Brocade further objects to this Request as duplicative and cumulative of Request Nos. 18, 19, 20, 71, 74, 75, 76, 77.

Brocade further objects to this Request as it requires the disclosure of confidential and proprietary information of Brocade and third parties. Brocade further objects to this Request to the extent the information is not in Brocade’s possession, custody, or control and is in the possession, custody, or control of third parties. Brocade further objects to this Request to the extent this information is already in Plaintiffs’ possession. Brocade further objects to this Request as this jurisdiction is an improper venue for this action.

Brocade objects to this Request to the extent it seeks disclosure of any information, documents, or other tangible things that is protected by any applicable privilege or protection,

including without limitation the attorney-client privilege, the attorney work product doctrine, the joint client privilege, the joint defense or common interest privilege, the constitutional right to privacy, and the Federal Rules of Civil Procedure.

Subject to and without waiving these objections, Brocade responds as follows:

For the purposes of these objections and responses, Brocade construes the term “Your” to mean only the specific entity named as a defendant in this action, Brocade Communications Systems LLC. Pursuant to the stipulation of the parties, and in the interest of proceeding with discovery despite Plaintiffs’ overbroad and vague definitions, Brocade limited its response to Interrogatory number 1 to the products identified in Paragraph 64 of the Complaint (ECF No. 1). In so doing, Brocade does not concede that these products contain any SNMP Research software, including the software listed in Paragraph 33, Table 1 of the Complaint (ECF No. 1) or any other copyrighted works held by SNMP Research. Brocade does not identify any Broadcom involvement in response to Interrogatory number 16.

REQUEST FOR PRODUCTION NO. 17:

All Documents Relating to SNMP Research’s Interrogatory number 17, and Your answers and responses to the same.

SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 17:

Brocade incorporates its original objections to this Request served on January 25, 2021 and supplements as follows: In addition to the Preliminary Statement, General Objections, and objections to Interrogatory number 17, which are incorporated herein by reference, Brocade objects to this Request, which seeks “all” Documents “Relating to” Interrogatory number 17, as vague, ambiguous, compound, and overbroad, particularly as to SNMP’s definition of “Brocade,”

“Products,” “Identify,” “SNMP Research Software,” “agent,” “directly or indirectly,” and “Relating to,” the request for “all Documents Relating to” without further specification, the overbroad time period, and the categories required to be identified by the Interrogatory. Interrogatory number 17 is nonsensical because SNMP has defined Brocade to include Broadcom and vice versa, as well as all other affiliated entities and more. Brocade objects because Interrogatory number 17 seeks a legal conclusion as to the term “agent” and “directly and indirectly.” Conducting a search for documents of such broad scope under SNMP’s defined and undefined terms would be unduly burdensome. This Request as framed seeks information that is irrelevant and not proportional to the needs of the case. Indeed, the problems with Interrogatory number 17 are compounded by this Request, which seeks “[a]ll Documents” “relating to” an already overbroad, vague, premature, irrelevant, and unduly burdensome interrogatory, to which Brocade only served objections.

Brocade further objects to this Request as it requires the disclosure of confidential and proprietary information of Brocade and third parties. Brocade further objects to this Request to the extent the information is not in Brocade’s possession, custody, or control and is in the possession, custody, or control of third parties. Brocade further objects to this Request to the extent this information is already in Plaintiffs’ possession. Brocade further objects to this Request as this jurisdiction is an improper venue for this action.

Brocade objects to this Request to the extent it seeks disclosure of any information, documents, or other tangible things that is protected by any applicable privilege or protection, including without limitation the attorney-client privilege, the attorney work product doctrine, the joint client privilege, the joint defense or common interest privilege, the constitutional right to privacy, and the Federal Rules of Civil Procedure.

Subject to and without waiving these objections, Brocade responds as follows:

For the purposes of these objections and responses, Brocade construes the term “Your” to mean only the specific entity named as a defendant in this action, Brocade Communications Systems LLC. Pursuant to the stipulation of the parties, and in the interest of proceeding with discovery despite Plaintiffs’ overbroad and vague definitions, Brocade limited its response to Interrogatory number 1 to the products identified in Paragraph 64 of the Complaint (ECF No. 1). In so doing, Brocade does not concede that these products contain any SNMP Research software, including the software listed in Paragraph 33, Table 1 of the Complaint (ECF No. 1) or any other copyrighted works held by SNMP Research. Brocade did not identify any instances in response to Interrogatory number 17.

REQUEST FOR PRODUCTION NO. 18:

All Documents Relating to SNMP Research’s Interrogatory number 18, and Your answers and responses to the same.

SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 18:

Brocade incorporates its original objections to this Request served on January 25, 2021 and supplements as follows: In addition to the Preliminary Statement, General Objections, and objections to Interrogatory number 18, which are incorporated herein by reference, Brocade objects to this Request, which seeks “all” Documents “Relating to” Interrogatory number 18, as vague, ambiguous, compound, and overbroad, particularly as to SNMP’s definition of “Brocade,” “Products,” “Identify,” “SNMP Research Software,” “indirect,” “marketing,” “advertising,” “distributing,” “servicing,” and “Relating to,” the request for “all Documents Relating to” without further specification, the overbroad time period, and the categories required to be identified by the

Interrogatory. Under these definitions, Interrogatory number 18 is nonsensical, because SNMP has defined “Broadcom” to include “Brocade.” SNMP Research Software is similarly broadly defined to include individuals and entities unknown to Brocade and to include software beyond the scope of this lawsuit. Brocade objects that Interrogatory number 18 assumes facts that have not been proven by SNMP. Conducting a search for documents of such broad scope under SNMP’s defined and undefined terms would be unduly burdensome. This Request as framed seeks information that is irrelevant and not proportional to the needs of the case. Brocade further objects to this Request as premature as it first requires review of information in SNMP’s possession, including its software and/or source code. Brocade further objects to this Request as seeking premature expert discovery, analysis, and opinion. Indeed, the problems with Interrogatory number 18 are compounded by this Request, which seeks “[a]ll Documents” “relating to” an already overbroad, vague, premature, irrelevant, and unduly burdensome interrogatory, to which Brocade only served objections. Brocade further objects to this Request as duplicative and cumulative of Request for Production Nos. 15, 16, 19, 20, 71, 74, 75, 76, and 77.

Brocade further objects to this Request as it requires the disclosure of confidential and proprietary information of Brocade and third parties. Brocade further objects to this Request to the extent the information is not in Brocade’s possession, custody, or control and is in the possession, custody, or control of third parties. Brocade further objects to this Request to the extent this information is already in Plaintiffs’ possession. Brocade further objects to this Request as this jurisdiction is an improper venue for this action.

Brocade objects to this Request to the extent it seeks disclosure of any information, documents, or other tangible things that is protected by any applicable privilege or protection, including without limitation the attorney-client privilege, the attorney work product doctrine, the

joint client privilege, the joint defense or common interest privilege, the constitutional right to privacy, and the Federal Rules of Civil Procedure.

Subject to and without waiving these objections, Brocade responds as follows:

For the purposes of these objections and responses, Brocade construes the term “Your” to mean only the specific entity named as a defendant in this action, Brocade Communications Systems LLC. Pursuant to the stipulation of the parties, and in the interest of proceeding with discovery despite Plaintiffs’ overbroad and vague definitions, Brocade limited its response to Interrogatory number 1 to the products identified in Paragraph 64 of the Complaint (ECF No. 1). In so doing, Brocade does not concede that these products contain any SNMP Research software, including the software listed in Paragraph 33, Table 1 of the Complaint (ECF No. 1) or any other copyrighted works held by SNMP Research. Brocade does not identify any Broadcom involvement in response to Interrogatory number 18.

REQUEST FOR PRODUCTION NO. 19:

All Documents Relating to SNMP Research’s Interrogatory number 19, and Your answers and responses to the same.

SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 19:

Brocade incorporates its original objections to this Request served on January 25, 2021 and supplements as follows: In addition to the Preliminary Statement, General Objections, and objections to Interrogatory numbers 1 and 19, which are incorporated herein by reference, Brocade objects to this Request, which seeks “all” Documents “Relating to” Interrogatory number 19, as vague, ambiguous, compound, and overbroad, particularly as to SNMP’s definition of “Brocade,” “Products,” “Identify,” “SNMP Research Software,” “indirectly,” “marketing, advertising, selling,

servicing, or distributing in Tennessee,” and “Relating to,” the request for “all Documents Relating to” without further specification, the overbroad time period, and the categories required to be identified by the Interrogatory. Brocade further objects that Interrogatory number 19 seeks information prior to the date SNMP alleged it terminated the License Agreement and after the date this lawsuit was filed. This Interrogatory is also nonsensical because SNMP has defined Brocade to include Broadcom and vice versa, as well as all other affiliated entities and more. SNMP Research Software is similarly broadly defined to include individuals and entities unknown to Brocade and to include software beyond the scope of this lawsuit. Brocade objects that Interrogatory number 19 assumes facts that have not been proven by SNMP. Conducting a search for documents of such broad scope under SNMP’s defined and undefined terms would be unduly burdensome. This Request as framed seeks information that is irrelevant and not proportional to the needs of the case. Brocade further objects to this Request as premature as it first requires review of information in SNMP’s possession, including its related entities, affiliates, predecessors, employees, software and/or source code. Brocade further objects to this Request as seeking premature expert discovery, analysis, and opinion. Indeed, the problems with Interrogatory number 19 are compounded by this Request, which seeks “[a]ll Documents” “relating to” an already overbroad, vague, premature, irrelevant, and unduly burdensome interrogatory, to which Brocade only served objections. Brocade further objects to this Request as duplicative and cumulative of Request for Production Nos. 15, 16, 18, 20, 71, 74, 75, 76, and 77.

Brocade further objects to this Request as it requires the disclosure of confidential and proprietary information of Brocade and third parties. Brocade further objects to this Request to the extent the information is not in Brocade’s possession, custody, or control and is in the possession, custody, or control of third parties. Brocade further objects to this Request to the

extent this information is already in Plaintiffs' possession. Brocade further objects to this Request as this jurisdiction is an improper venue for this action.

Brocade objects to this Request to the extent it seeks disclosure of any information, documents, or other tangible things that is protected by any applicable privilege or protection, including without limitation the attorney-client privilege, the attorney work product doctrine, the joint client privilege, the joint defense or common interest privilege, the constitutional right to privacy, and the Federal Rules of Civil Procedure.

Subject to and without waiving these objections, Brocade responds as follows:

For the purposes of these objections and responses, Brocade construes the term "Your" to mean only the specific entity named as a defendant in this action, Brocade Communications Systems LLC. Pursuant to the stipulation of the parties, and in the interest of proceeding with discovery despite Plaintiffs' overbroad and vague definitions, Brocade limited its response to Interrogatory number 1 to the products identified in Paragraph 64 of the Complaint (ECF No. 1). In so doing, Brocade does not concede that these products contain any SNMP Research software, including the software listed in Paragraph 33, Table 1 of the Complaint (ECF No. 1) or any other copyrighted works held by SNMP Research. Brocade does not identify any Broadcom involvement in response to Interrogatory number 19.

REQUEST FOR PRODUCTION NO. 20:

All Documents Relating to SNMP Research's Interrogatory number 20, and Your answers and responses to the same.

SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 20:

Brocade incorporates its original objections to this Request served on January 25, 2021 and supplements as follows: In addition to the Preliminary Statement, General Objections, and objections to Interrogatory numbers 1 and 20, which are incorporated herein by reference, Brocade objects to this Request, which seeks “all” Documents “Relating to” Interrogatory number 20, as vague, ambiguous, compound, and overbroad, particularly as to SNMP’s definition of “Brocade,” “Products,” “Identify,” “SNMP Research Software,” “directly or indirectly involved,” “marketing, advertising, selling, servicing, or distributing,” and “Relating to,” the request for “all Documents Relating to” without further specification, the overbroad time period, and the categories required to be identified by the Interrogatory. Brocade further objects that this Interrogatory seeks information prior to the date SNMP alleged it terminated the License Agreement and after the date this lawsuit was filed. Interrogatory number 20 is also nonsensical because SNMP has defined Brocade to include Broadcom and vice versa, as well as all other affiliated entities and more. SNMP Research Software is similarly broadly defined to include individuals and entities unknown to Brocade and to include software beyond the scope of this lawsuit. Brocade objects that Interrogatory number 20 assumes facts that have not been proven by SNMP. Conducting a search for documents of such broad scope under SNMP’s defined and undefined terms would be unduly burdensome. This Request as framed seeks information that is irrelevant and not proportional to the needs of the case. Brocade further objects to this Request as premature as it first requires review of information in SNMP’s possession, including its software and/or source code. Brocade further objects to this Request as seeking premature expert discovery, analysis, and opinion. Indeed, the problems with Interrogatory number 20 are compounded by this Request, which seeks “[a]ll Documents” “relating to” an already overbroad, vague, premature,

irrelevant, and unduly burdensome interrogatory, to which Brocade only served objections. Brocade further objects to this Request as duplicative and cumulative of Request for Production Nos. 15, 16, 18, 19, 71, 74, 75, 76, and 77.

Brocade further objects to this Request as it requires the disclosure of confidential and proprietary information of Brocade and third parties. Brocade further objects to this Request to the extent the information is not in Brocade's possession, custody, or control and is in the possession, custody, or control of third parties. Brocade further objects to this Request to the extent this information is already in Plaintiffs' possession. Brocade further objects to this Request as this jurisdiction is an improper venue for this action.

Brocade objects to this Request to the extent it seeks disclosure of any information, documents, or other tangible things that is protected by any applicable privilege or protection, including without limitation the attorney-client privilege, the attorney work product doctrine, the joint client privilege, the joint defense or common interest privilege, the constitutional right to privacy, and the Federal Rules of Civil Procedure.

Subject to and without waiving these objections, Brocade responds as follows:

For the purposes of these objections and responses, Brocade construes the term "Your" to mean only the specific entity named as a defendant in this action, Brocade Communications Systems LLC. Pursuant to the stipulation of the parties, and in the interest of proceeding with discovery despite Plaintiffs' overbroad and vague definitions, Brocade limited its response to Interrogatory number 1 to the products identified in Paragraph 64 of the Complaint (ECF No. 1). In so doing, Brocade does not concede that these products contain any SNMP Research software, including the software listed in Paragraph 33, Table 1 of the Complaint (ECF No. 1) or any other

copyrighted works held by SNMP Research. Brocade does not identify any Broadcom involvement in response to Interrogatory number 20.

REQUEST FOR PRODUCTION NO. 21:

All Documents Relating to SNMP Research's Interrogatory number 21, and Your answers and responses to the same.

SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 21:

Brocade incorporates its original objections to this Request served on January 25, 2021 and supplements as follows: In addition to the Preliminary Statement, General Objections, and objections to Interrogatory number 21, which are incorporated herein by reference, Brocade objects to this Request, which seeks "all" Documents "Relating to" Interrogatory number 21, as vague, ambiguous, compound, and overbroad, particularly as to SNMP's definition of "Brocade," "Products," "Identify," "SNMP Research Software," "partners or distributors," "marketing, advertising, selling, or distributing" and "in or to Tennessee," and "Relating to," the request for "all Documents Relating to" without further specification, the overbroad time period, and the categories required to be identified. SNMP Research Software is broadly defined to include individuals and entities unknown to Brocade and to include software beyond the scope of this lawsuit. Brocade objects that Interrogatory number 21 assumes facts that have not been proven by SNMP. Conducting a search for documents of such broad scope under SNMP's defined and undefined terms would be unduly burdensome. This Request as framed seeks information that is irrelevant and not proportional to the needs of the case. Brocade further objects to this Request as premature as it first requires review of information in SNMP's possession, including its software and/or source code. Brocade further objects to this Request as seeking premature expert discovery,

analysis, and opinion. Indeed, the problems with Interrogatory number 21 are compounded by this Request, which seeks “[a]ll Documents” “relating to” an already overbroad, vague, premature, irrelevant, and unduly burdensome interrogatory, to which Brocade only served objections.

Brocade further objects to this Request as duplicative and cumulative of Request Nos. 83 and 84. Brocade further objects that it imposes obligations on Brocade that are not required by the Federal Rules of Civil Procedure and the tasks can just as easily be done by Plaintiffs (e.g., organize the response by “Tennessee Grand Division.”

Brocade further objects to this Request as it requires the disclosure of confidential and proprietary information of Brocade and third parties. Brocade further objects to this Request to the extent the information is not in Brocade’s possession, custody, or control and is in the possession, custody, or control of third parties. Brocade further objects to this Request to the extent this information is already in Plaintiffs’ possession. Brocade further objects to this Request as this jurisdiction is an improper venue for this action.

Brocade objects to this Request to the extent it seeks disclosure of any information, documents, or other tangible things that is protected by any applicable privilege or protection, including without limitation the attorney-client privilege, the attorney work product doctrine, the joint client privilege, the joint defense or common interest privilege, the constitutional right to privacy, and the Federal Rules of Civil Procedure.

Subject to and without waiving these objections, Brocade responds as follows:

For the purposes of these objections and responses, Brocade construes the term “Your” to mean only the specific entity named as a defendant in this action, Brocade Communications Systems LLC. Pursuant to the stipulation of the parties, and in the interest of proceeding with discovery despite Plaintiffs’ overbroad and vague definitions, Brocade limited its response to

Interrogatory number 1 to the products identified in Paragraph 64 of the Complaint (ECF No. 1). In so doing, Brocade does not concede that these products contain any SNMP Research software, including the software listed in Paragraph 33, Table 1 of the Complaint (ECF No. 1) or any other copyrighted works held by SNMP Research. As indicated in Brocade's response to Interrogatory number 21, Brocade is willing to meet and confer regarding the meaning and scope of Interrogatory number 21 and documents related thereto.

REQUEST FOR PRODUCTION NO. 22:

All user guides, manuals, or other instructional Documents relating to the Products Identified in response to Interrogatory number 1.

SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 22:

Brocade incorporates its original objections to this Request served on January 25, 2021 and supplements as follows: In addition to the Preliminary Statement, General Objections, and objections to Interrogatory number 1, which are incorporated herein by this reference, Brocade objects to this Request as vague, ambiguous, compound, and overbroad, particularly as to SNMP's definition of "Products," "relating to," and "Identified," the vague and undefined terms "user guides, manuals, or other instructional Documents," the request for "all" such Documents without further specification, and the overbroad time period. Under SNMP's definitions incorporated into this Request through Interrogatory number 1, Brocade is defined to include, *inter alia*, all affiliated entities, including co-defendant Broadcom Inc. SNMP Research is similarly defined to include, *inter alia*, both Plaintiffs' predecessors, agents, representatives, divisions, and subsidiaries, which are unknown to Brocade. The definition of SNMP Research Software incorporates these overbroad entity definitions, and also includes software, Source Code and Derivative Works that

are beyond the scope of this lawsuit. Conducting a search for documents of such broad scope under SNMP's defined and undefined terms would be unduly burdensome. The Request seeks documents that are irrelevant and not proportional to the needs of the case. Brocade further objects to this Request as premature as it first requires review of information in SNMP's possession, including its software and/or source code. Brocade further objects to this Request as seeking premature expert discovery, analysis, and opinion. Moreover, no Products were Identified in response to Interrogatory number 1. The problems with Interrogatory number 1 are compounded by this Request, which seeks additional information concerning an Interrogatory that is already overbroad, vague, premature, irrelevant, and unduly burdensome, and to which Brocade only served objections.

Brocade further objects to this Request as it requires the disclosure of confidential and proprietary information, documents, and tangible things of Brocade and third parties. Brocade further objects to this Requests to the extent the documents sought are not in Brocade's possession, custody, or control and are in the possession, custody, or control of third parties. Brocade further objects to this Request to the extent the documents sought are already in Plaintiffs' possession. Brocade further objects to this Request as this jurisdiction is an improper venue for this action.

Brocade objects to this Request to the extent it seeks disclosure of any information, documents, or other tangible things that is protected by any applicable privilege or protection, including without limitation the attorney-client privilege, the attorney work product doctrine, the joint client privilege, the joint defense or common interest privilege, the constitutional right to privacy, and the Federal Rules of Civil Procedure.

Subject to and without waiving these objections, Brocade responds as follows:

Brocade will produce, on a rolling basis, non-privileged user guides and manuals, to the

extent such documents exist, are within Brocade's possession, custody, or control, have not already been produced, and are located after a reasonably diligent search, that are responsive to this Request created after July 25, 2019. Brocade is willing to meet and confer regarding the meaning and scope of "other instructional Documents."

REQUEST FOR PRODUCTION NO. 23:

All versions of software and firmware produced, used, distributed, or otherwise created for the Products Identified in response to Interrogatory number 1.

SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 23:

Brocade incorporates its original objections to this Request served on January 25, 2021 and supplements as follows: In addition to the Preliminary Statement, General Objections, and objections to Interrogatory number 1, which are incorporated herein by this reference, Brocade objects to this Request as vague, ambiguous, compound, and overbroad, particularly as to SNMP's definition of "Products" and "Identified," the vague and undefined terms "all versions of software" and "firmware produced, used, distributed, or otherwise created," the request for "all" versions without further specification, and the overbroad time period. . . Under SNMP's definitions incorporated into this Request through Interrogatory number 1, Brocade is defined to include, *inter alia*, all affiliated entities, including co-defendant Broadcom Inc. SNMP Research is similarly defined to include, *inter alia*, both Plaintiffs' predecessors, agents, representatives, divisions, and subsidiaries, which are unknown to Brocade. The definition of SNMP Research Software incorporates these overbroad entity definitions, and also includes software, Source Code and Derivative Works that are beyond the scope of this lawsuit. Conducting a search for documents of such broad scope under SNMP's defined and undefined terms would be unduly burdensome.

The Request seeks documents that are irrelevant and not proportional to the needs of the case. Brocade further objects to this Request as premature as it first requires review of information in SNMP's possession, including its software and/or source code. Brocade further objects to this Request as seeking premature expert discovery, analysis, and opinion. Moreover, no Products were Identified in response to Interrogatory number 1. The problems with Interrogatory number 1 are compounded by this Request, which seeks additional information concerning an Interrogatory that is already overbroad, vague, premature, irrelevant, and unduly burdensome, and to which Brocade only served objections.

Brocade further objects to this Request as it requires the disclosure of confidential and proprietary information, documents, and tangible things of Brocade and third parties. Brocade further objects to this Requests to the extent the documents sought are not in Brocade's possession, custody, or control and are in the possession, custody, or control of third parties. Brocade further objects to this Request to the extent the documents sought are already in Plaintiffs' possession. Brocade further objects to this Request as this jurisdiction is an improper venue for this action.

Brocade objects to this Request to the extent it seeks disclosure of any information, documents, or other tangible things that is protected by any applicable privilege or protection, including without limitation the attorney-client privilege, the attorney work product doctrine, the joint client privilege, the joint defense or common interest privilege, the constitutional right to privacy, and the Federal Rules of Civil Procedure.

Subject to and without waiving these objections, Brocade responds as follows:

Brocade is willing to meet and confer regarding the meaning and scope of this Request.

REQUEST FOR PRODUCTION NO. 24:

All Documents detailing release dates, technical details, downloads, distribution and use of each version for the Products Identified in response to Interrogatory number 1.

SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 24:

Brocade incorporates its original objections to this Request served on January 25, 2021 and supplements as follows: In addition to the Preliminary Statement, General Objections, and objections to Interrogatory number 1, which are incorporated herein by this reference, Brocade objects to this Request as vague, ambiguous, compound, and overbroad, particularly as to SNMP's definition of "Products" and "Identified," the vague and undefined terms "detailing," "release dates," "technical details," "downloads," "distribution," "use," and "each version" the request for "all" Documents without further specification, and the overbroad time period. Under SNMP's definitions incorporated into this Request through Interrogatory number 1, Brocade is defined to include, *inter alia*, all affiliated entities, including co-defendant Broadcom Inc. SNMP Research is similarly defined to include, *inter alia*, both Plaintiffs' predecessors, agents, representatives, divisions, and subsidiaries, which are unknown to Brocade. The definition of SNMP Research Software incorporates these overbroad entity definitions, and also includes software, Source Code and Derivative Works that are beyond the scope of this lawsuit. Conducting a search for documents of such broad scope under SNMP's defined and undefined terms would be unduly burdensome. The Request seeks documents that are irrelevant and not proportional to the needs of the case. Brocade further objects to this Request as premature as it first requires review of information in SNMP's possession, including its software and/or source code. Brocade further objects to this Request as seeking premature expert discovery, analysis, and opinion. Moreover, no Products were identified in response to Interrogatory number 1. The problems with

Interrogatory number 1 are compounded by this Request, which seeks additional information concerning an Interrogatory that is already overbroad, vague, premature, irrelevant, and unduly burdensome, and to which Brocade only served objections.

Brocade further objects to this Request as it requires the disclosure of confidential and proprietary information, documents, and tangible things of Brocade and third parties. Brocade further objects to this Requests to the extent the documents sought are not in Brocade's possession, custody, or control and are in the possession, custody, or control of third parties. Brocade further objects to this Request to the extent the documents sought are already in Plaintiffs' possession. Brocade further objects to this Request as this jurisdiction is an improper venue for this action.

Brocade objects to this Request to the extent it seeks disclosure of any information, documents, or other tangible things that is protected by any applicable privilege or protection, including without limitation the attorney-client privilege, the attorney work product doctrine, the joint client privilege, the joint defense or common interest privilege, the constitutional right to privacy, and the Federal Rules of Civil Procedure.

Subject to and without waiving these objections, Brocade responds as follows:

Brocade is willing to meet and confer regarding the meaning and scope of this Request.

REQUEST FOR PRODUCTION NO. 25:

All install images for all versions of each Product, for each software or firmware version, Identified in response to Interrogatory number 1.

SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 25:

Brocade incorporates its original objections to this Request served on January 25, 2021 and supplements as follows: In addition to the Preliminary Statement, General Objections, and

objections to Interrogatory number 1, which are incorporated herein by this reference, Brocade objects to this Request as vague, ambiguous, compound, and overbroad, particularly as to SNMP's definition of "Product" and "Identified," the vague and undefined terms "all install images," "all versions of each Product," "software," and "firmware," the request for "all" install images without further specification, and the unlimited time period. Under SNMP's definitions incorporated into this Request through Interrogatory number 1, Brocade is defined to include, *inter alia*, all affiliated entities, including co-defendant Broadcom Inc. SNMP Research is similarly defined to include, *inter alia*, both Plaintiffs' predecessors, agents, representatives, divisions, and subsidiaries, which are unknown to Brocade. The definition of SNMP Research Software incorporates these overbroad entity definitions, and also includes software, Source Code and Derivative Works that are beyond the scope of this lawsuit. Conducting a search for documents of such broad scope under SNMP's defined and undefined terms would be unduly burdensome. The Request seeks documents that are irrelevant and not proportional to the needs of the case. Brocade further objects to this Request as premature as it first requires review of information in SNMP's possession, including its software and/or source code. Brocade further objects to this Request as seeking premature expert discovery, analysis, and opinion. Moreover, no Products were identified in response to Interrogatory number 1. The problems with Interrogatory number 1 are compounded by this Request, which seeks additional information concerning an Interrogatory that is already overbroad, vague, premature, irrelevant, and unduly burdensome, and to which Brocade only served objections.

Brocade further objects to this Request as it requires the disclosure of confidential and proprietary information, documents, and tangible things of Brocade and third parties. Brocade further objects to this Requests to the extent the documents sought are not in Brocade's possession,

custody, or control and are in the possession, custody, or control of third parties. Brocade further objects to this Request to the extent the documents sought are already in Plaintiffs' possession. Brocade further objects to this Request as this jurisdiction is an improper venue for this action.

Brocade objects to this Request to the extent it seeks disclosure of any information, documents, or other tangible things that is protected by any applicable privilege or protection, including without limitation the attorney-client privilege, the attorney work product doctrine, the joint client privilege, the joint defense or common interest privilege, the constitutional right to privacy, and the Federal Rules of Civil Procedure.

Subject to and without waiving these objections, Brocade responds as follows:

Brocade is willing to meet and confer regarding the meaning and scope of this Request.

REQUEST FOR PRODUCTION NO. 26:

All Source Code, including all versions, for each Product Identified in response to Interrogatory numbers 1 and 2.

SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 26:

Brocade incorporates its original objections to this Request served on January 25, 2021 and supplements as follows: In addition to the Preliminary Statement, General Objections, and objections to Interrogatory numbers 1 and 2, which are incorporated herein by this reference, Brocade objects to this Request as vague, ambiguous, compound, and overbroad, particularly as to SNMP's definition of "Products," "Source Code," and "Identified," the request for "all" Source Code and "all" versions without further specification, the vague and undefined term "all versions," and the overbroad time period. Under SNMP's definitions incorporated into this Request through Interrogatory numbers 1 and 2, Brocade is defined to include, *inter alia*, all affiliated entities,

including co-defendant Broadcom Inc. SNMP Research is similarly defined to include, *inter alia*, both Plaintiffs' predecessors, agents, representatives, divisions, and subsidiaries, which are unknown to Brocade. The definition of SNMP Research Software incorporates these overbroad entity definitions, and also includes software, Source Code and Derivative Works that are beyond the scope of this lawsuit. Conducting a search for documents of such broad scope under SNMP's defined and undefined terms would be unduly burdensome. The Request seeks documents that are irrelevant and not proportional to the needs of the case. Brocade further objects to this Request as premature as it first requires review of information in SNMP's possession, including its software and/or source code. Brocade further objects to this Request as seeking premature expert discovery, analysis, and opinion. Moreover, no Products were Identified in response to Interrogatory numbers 1 and 2. The problems with Interrogatory numbers 1 and 2 are compounded by this Request, which seeks additional information concerning Interrogatories that are already overbroad, vague, premature, irrelevant, and unduly burdensome, and to which Brocade only served objections.

Brocade further objects to this Request as it requires the disclosure of confidential and proprietary information, documents, and tangible things of Brocade and third parties. Brocade further objects to this Requests to the extent the documents sought are not in Brocade's possession, custody, or control and are in the possession, custody, or control of third parties. Brocade further objects to this Request to the extent the documents sought are already in Plaintiffs' possession. Brocade further objects to this Request as this jurisdiction is an improper venue for this action.

Brocade objects to this Request to the extent it seeks disclosure of any information, documents, or other tangible things that is protected by any applicable privilege or protection, including without limitation the attorney-client privilege, the attorney work product doctrine, the

joint client privilege, the joint defense or common interest privilege, the constitutional right to privacy, and the Federal Rules of Civil Procedure.

Subject to and without waiving these objections, Brocade responds as follows:

Brocade is willing to meet and confer regarding the meaning and scope of this Request.

REQUEST FOR PRODUCTION NO. 27:

A copy of all Source Code, authored in whole or in part by SNMP Research, for each release of each Product Identified in response to Interrogatory numbers 1 and 2. Notwithstanding the production form set forth in Instruction number 2, this copy shall be produced in a secure manner (e.g., on an encrypted hard drive) in its native form, and in a file structure and format that mirrors the file structure and format as maintained by You in the ordinary course of business.

SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 27:

Brocade incorporates its original objections to this Request served on January 25, 2021 and supplements as follows: In addition to the Preliminary Statement, General Objections, and objections to Interrogatory numbers 1 and 2, which are incorporated herein by this reference, Brocade objects to this Request as vague, ambiguous, compound, duplicative, and overbroad, particularly as to SNMP's definition of "You," "Product," "Source Code," and "Identified," the vague terms "authored," "each release of each Product," "native form," and "file structure and format," the request for "all Source Code" without further specification and regardless of whether it was authored by SNMP Research, and the overbroad time period. Under SNMP's definitions incorporated into this Request through Interrogatory numbers 1 and 2, Brocade is defined to include, *inter alia*, all affiliated entities, including co-defendant Broadcom Inc. SNMP Research is similarly defined to include, *inter alia*, both Plaintiffs' predecessors, agents, representatives,

divisions, and subsidiaries, which are unknown to Brocade. The definition of SNMP Research Software incorporates these overbroad entity definitions, and also includes software, Source Code and Derivative Works that are beyond the scope of this lawsuit. Conducting a search for documents of such broad scope under SNMP's defined and undefined terms would be unduly burdensome. The Request seeks documents that are irrelevant and not proportional to the needs of the case. Brocade further objects to this Request as premature as it first requires review of information in SNMP's possession, including its software and/or source code. Brocade further objects to this Request as seeking premature expert discovery, analysis, and opinion. Moreover, no Products were Identified in response to Interrogatory numbers 1 and 2. The problems with Interrogatory numbers 1 and 2 are compounded by this Request, which seeks additional information concerning Interrogatories that are already overbroad, vague, premature, irrelevant, and unduly burdensome, and to which Brocade only served objections.

Brocade further objects to this Request as it requires the disclosure of confidential and proprietary information, documents, and tangible things of Brocade and third parties. Brocade further objects to this Requests to the extent the documents sought are not in Brocade's possession, custody, or control and are in the possession, custody, or control of third parties. Brocade further objects to this Request to the extent the documents sought are already in Plaintiffs' possession. Brocade further objects to this Request as this jurisdiction is an improper venue for this action.

Brocade objects to this Request to the extent it seeks disclosure of any information, documents, or other tangible things that is protected by any applicable privilege or protection, including without limitation the attorney-client privilege, the attorney work product doctrine, the joint client privilege, the joint defense or common interest privilege, the constitutional right to privacy, and the Federal Rules of Civil Procedure.

Subject to and without waiving these objections, Brocade responds as follows:

Brocade is willing to meet and confer regarding the meaning and scope of this Request.

REQUEST FOR PRODUCTION NO. 28:

The build environment along with instructions for building each Product for all Source Code produced in response to these requests for production.

SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 28:

Brocade incorporates its original objections to this Request served on January 25, 2021 and supplements as follows: In addition to the Preliminary Statement and General Objections, which are incorporated herein by this reference, Brocade objects to this Request as vague, ambiguous, compound, and overbroad, particularly as to SNMP's definition of "Product" and "Source Code," the vague term "build environment" and "instructions for building," the requests for the build environment for "all" Source Code without further specification, and the overbroad time period. . Under SNMP's definitions incorporated into this Request by reference to all other requests for production, Brocade is defined to include, *inter alia*, all affiliated entities, including co-defendant Broadcom Inc. SNMP Research is similarly defined to include, *inter alia*, both Plaintiffs' predecessors, agents, representatives, divisions, and subsidiaries, which are unknown to Brocade. The definition of SNMP Research Software incorporates these overbroad entity definitions, and also includes software, Source Code and Derivative Works that are beyond the scope of this lawsuit. Conducting a search for documents of such broad scope under SNMP's defined and undefined terms would be unduly burdensome. The Request seeks documents that are irrelevant and not proportional to the needs of the case. Brocade further objects to this Request as premature as it first requires review of information in SNMP's possession, including its software and/or

source code. Brocade further objects to this Request as seeking premature expert discovery, analysis, and opinion. Moreover, no Source Code has been produced in response to these requests for production.

Brocade further objects to this Request as it requires the disclosure of confidential and proprietary information, documents, and tangible things of Brocade and third parties. Brocade further objects to this Requests to the extent the documents sought are not in Brocade's possession, custody, or control and are in the possession, custody, or control of third parties. Brocade further objects to this Request to the extent the documents sought are already in Plaintiffs' possession. Brocade further objects to this Request as this jurisdiction is an improper venue for this action.

Brocade objects to this Request to the extent it seeks disclosure of any information, documents, or other tangible things that is protected by any applicable privilege or protection, including without limitation the attorney-client privilege, the attorney work product doctrine, the joint client privilege, the joint defense or common interest privilege, the constitutional right to privacy, and the Federal Rules of Civil Procedure.

Subject to and without waiving these objections, Brocade responds as follows:

Brocade is willing to meet and confer regarding the meaning and scope of this Request.

REQUEST FOR PRODUCTION NO. 29:

All Communications concerning actual or potential use of SNMP Research Software in Brocade Products.

SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 29:

Brocade incorporates its original objections to this Request served on January 25, 2021 and supplements as follows: In addition to the Preliminary Statement and General Objections, which

are incorporated herein by this reference, Brocade objects to this Request as vague, ambiguous, compound, and overbroad, particularly as to SNMP's definition of "Brocade," "Products," and "SNMP Research Software," the vague and undefined term "actual or potential use," the request for "all Communications" without further specification, and the overbroad time period. Under SNMP's definitions incorporated into this Request, Brocade is defined to include, *inter alia*, all affiliated entities, including co-defendant Broadcom Inc. SNMP Research is similarly defined to include, *inter alia*, both Plaintiffs' predecessors, agents, representatives, divisions, and subsidiaries, which are unknown to Brocade. The definition of SNMP Research Software incorporates these overbroad entity definitions, and also includes software, Source Code and Derivative Works that are beyond the scope of this lawsuit. Conducting a search of such broad scope under SNMP's defined and undefined terms would be unduly burdensome and then listing all Communications would be unduly burdensome. The Request seeks Communications that are irrelevant and not proportional to the needs of the case. Brocade further objects to this Request as premature as it first requires review of information in SNMP's possession, including its software and/or source code. Brocade further objects to this Request as seeking premature expert discovery, analysis, and opinion.

Brocade further objects to this Request as it requires the disclosure of confidential and proprietary information, documents, and tangible things of Brocade and third parties. Brocade further objects to this Requests to the extent the documents sought are not in Brocade's possession, custody, or control and are in the possession, custody, or control of third parties. Brocade further objects to this Request to the extent the documents sought are already in Plaintiffs' possession. Brocade further objects to this Request as this jurisdiction is an improper venue for this action.

Brocade objects to this Request to the extent it seeks disclosure of any information, documents, or other tangible things that is protected by any applicable privilege or protection, including without limitation the attorney-client privilege, the attorney work product doctrine, the joint client privilege, the joint defense or common interest privilege, the constitutional right to privacy, and the Federal Rules of Civil Procedure.

Subject to and without waiving these objections, Brocade responds as follows:

For the purposes of these objections and responses, Brocade construes the term “Brocade” to mean only the specific entity named as a defendant in this action, Brocade Communications Systems LLC. Pursuant to the stipulation of the parties, and in the interest of proceeding with discovery despite Plaintiffs’ overbroad and vague definitions, Brocade limited its response to Interrogatory number 1 to the products identified in Paragraph 64 of the Complaint (ECF No. 1). In so doing, Brocade does not concede that these products contain any SNMP Research software, including the software listed in Paragraph 33, Table 1 of the Complaint (ECF No. 1) or any other copyrighted works held by SNMP Research. Brocade will produce, on a rolling basis, non-privileged communications, to the extent such communications exist, are within Brocade’s possession, custody, or control, have not already been produced, and are located after a reasonably diligent search, concerning actual or potential use of Plaintiff’s software in the products identified in Paragraph 64 of the Complaint after July 25, 2019.

REQUEST FOR PRODUCTION NO. 30:

All Communications concerning the actual or potential removal of SNMP Research Software from Brocade Products.

SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 30:

Brocade incorporates its original objections to this Request served on January 25, 2021 and supplements as follows: In addition to the Preliminary Statement and General Objections, which are incorporated herein by this reference, Brocade objects to this Request as vague, ambiguous, compound, and overbroad, particularly as to SNMP's definition of "Brocade," "Products," and "SNMP Research Software," the vague and undefined term "actual or potential removal," the request for "all Communications" without further specification, and the overbroad time period. Under SNMP's definitions incorporated into this Request, Brocade is defined to include, *inter alia*, all affiliated entities, including co-defendant Broadcom Inc. SNMP Research is similarly defined to include, *inter alia*, both Plaintiffs' predecessors, agents, representatives, divisions, and subsidiaries, which are unknown to Brocade. The definition of SNMP Research Software incorporates these overbroad entity definitions, and also includes software, Source Code and Derivative Works that are beyond the scope of this lawsuit. Conducting a search of such broad scope under SNMP's defined and undefined terms would be unduly burdensome and then listing all Communications would be unduly burdensome. The Request seeks Communications that are irrelevant and not proportional to the needs of the case. Brocade further objects to this Request as premature as it first requires review of information in SNMP's possession, including its software and/or source code. Brocade further objects to this Request as seeking premature expert discovery, analysis, and opinion.

Brocade further objects to this Request as it requires the disclosure of confidential and proprietary information, documents, and tangible things of Brocade and third parties. Brocade further objects to this Requests to the extent the documents sought are not in Brocade's possession, custody, or control and are in the possession, custody, or control of third parties. Brocade further

objects to this Request to the extent the documents sought are already in Plaintiffs' possession. Brocade further objects to this Request as this jurisdiction is an improper venue for this action.

Brocade objects to this Request to the extent it seeks disclosure of any information, documents, or other tangible things that is protected by any applicable privilege or protection, including without limitation the attorney-client privilege, the attorney work product doctrine, the joint client privilege, the joint defense or common interest privilege, the constitutional right to privacy, and the Federal Rules of Civil Procedure.

Subject to and without waiving these objections, Brocade responds as follows:

For the purposes of these objections and responses, Brocade construes the term "Brocade" to mean only the specific entity named as a defendant in this action, Brocade Communications Systems LLC. Pursuant to the stipulation of the parties, and in the interest of proceeding with discovery despite Plaintiffs' overbroad and vague definitions, Brocade limited its response to Interrogatory number 1 to the products identified in Paragraph 64 of the Complaint (ECF No. 1). In so doing, Brocade does not concede that these products contain any SNMP Research software, including the software listed in Paragraph 33, Table 1 of the Complaint (ECF No. 1) or any other copyrighted works held by SNMP Research. Brocade will produce, on a rolling basis, non-privileged communications, to the extent such communications exist, are within Brocade's possession, custody, or control, have not already been produced, and are located after a reasonably diligent search, concerning actual or potential removal of Plaintiff's software from the products identified in Paragraph 64 of the Complaint after July 25, 2019.

REQUEST FOR PRODUCTION NO. 31:

All Communications concerning the actual or potential infringement by Brocade of SNMP Research Software.

SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 31:

Brocade incorporates its original objections to this Request served on January 25, 2021 and supplements as follows: In addition to the Preliminary Statement and General Objections, which are incorporated herein by this reference, Brocade objects to this Request as vague, ambiguous, compound, and overbroad, particularly as to SNMP's definition of "Brocade" and "SNMP Research Software," the vague and undefined term "actual or potential infringement," the request for "all Communications" without further specification, and the overbroad time period. Under SNMP's definitions incorporated into this Request, Brocade is defined to include, *inter alia*, all affiliated entities, including co-defendant Broadcom Inc. SNMP Research is similarly defined to include, *inter alia*, both Plaintiffs' predecessors, agents, representatives, divisions, and subsidiaries, which are unknown to Brocade. The definition of SNMP Research Software incorporates these overbroad entity definitions, and also includes software, Source Code and Derivative Works that are beyond the scope of this lawsuit. Conducting a search of such broad scope under SNMP's defined and undefined terms would be unduly burdensome and then listing all Communications would be unduly burdensome. The Request seeks Communications that are irrelevant and not proportional to the needs of the case. Brocade further objects to this Request as premature as it first requires review of information in SNMP's possession, including its software and/or source code. Brocade further objects to this Request as seeking premature expert discovery, analysis, and opinion.

Brocade further objects to this Request as it requires the disclosure of confidential and proprietary information, documents, and tangible things of Brocade and third parties. Brocade further objects to this Requests to the extent the documents sought are not in Brocade's possession, custody, or control and are in the possession, custody, or control of third parties. Brocade further objects to this Request to the extent the documents sought are already in Plaintiffs' possession. Brocade further objects to this Request as this jurisdiction is an improper venue for this action.

Brocade objects to this Request to the extent it seeks disclosure of any information, documents, or other tangible things that is protected by any applicable privilege or protection, including without limitation the attorney-client privilege, the attorney work product doctrine, the joint client privilege, the joint defense or common interest privilege, the constitutional right to privacy, and the Federal Rules of Civil Procedure.

Subject to and without waiving these objections, Brocade responds as follows:

For the purposes of these objections and responses, Brocade construes the term "Brocade" to mean only the specific entity named as a defendant in this action, Brocade Communications Systems LLC. Pursuant to the stipulation of the parties, and in the interest of proceeding with discovery despite Plaintiffs' overbroad and vague definitions, Brocade limited its response to Interrogatory number 1 to the products identified in Paragraph 64 of the Complaint (ECF No. 1). In so doing, Brocade does not concede that these products contain any SNMP Research software, including the software listed in Paragraph 33, Table 1 of the Complaint (ECF No. 1) or any other copyrighted works held by SNMP Research. Brocade will produce, on a rolling basis, non-privileged communications after July 25, 2019, to the extent such communications exist, are within Brocade's possession, custody, or control, have not already been produced, and are located after a

reasonably diligent search, discussing Brocade's actual or potential infringement of Plaintiff's software related to the products identified in Paragraph 64 of the Complaint.

REQUEST FOR PRODUCTION NO. 32:

All Communications concerning SNMP Research or the SNMP Research Software.

SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 32:

Brocade incorporates its original objections to this Request served on January 25, 2021 and supplements as follows: In addition to the Preliminary Statement and General Objections, which are incorporated herein by this reference, Brocade objects to this Request as vague, ambiguous, compound, and overbroad, particularly as to SNMP's definition of "SNMP Research" and "SNMP Research Software," the vague term "concerning," the request for "all Communications" without further specification, and the overbroad time period. Under SNMP's definitions, SNMP Research is defined to include, *inter alia*, both Plaintiffs' predecessors, agents, representatives, divisions, and subsidiaries, which are unknown to Brocade. The definition of SNMP Research Software incorporates these overbroad entity definitions, and also includes software, Source Code and Derivative Works that are beyond the scope of this lawsuit. Conducting a search of such broad scope under SNMP's defined and undefined terms would be unduly burdensome and then listing all Communications would be unduly burdensome. The Request seeks Communications that are irrelevant and not proportional to the needs of the case. Brocade further objects to this Request as premature as it first requires review of information in SNMP's possession, including its software and/or source code. Brocade further objects to this Request as seeking premature expert discovery, analysis, and opinion.

Brocade further objects to this Request as it requires the disclosure of confidential and proprietary information, documents, and tangible things of Brocade and third parties. Brocade further objects to this Requests to the extent the documents sought are not in Brocade's possession, custody, or control and are in the possession, custody, or control of third parties. Brocade further objects to this Request to the extent the documents sought are already in Plaintiffs' possession. Brocade further objects to this Request as this jurisdiction is an improper venue for this action.

Brocade objects to this Request to the extent it seeks disclosure of any information, documents, or other tangible things that is protected by any applicable privilege or protection, including without limitation the attorney-client privilege, the attorney work product doctrine, the joint client privilege, the joint defense or common interest privilege, the constitutional right to privacy, and the Federal Rules of Civil Procedure.

Subject to and without waiving these objections, Brocade responds as follows:

Brocade is willing to meet and confer regarding the meaning and scope of this Request.

REQUEST FOR PRODUCTION NO. 33:

All Communications between Brocade and any third party concerning SNMP Research, the SNMP Research Software, or this litigation.

SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 33:

Brocade incorporates its original objections to this Request served on January 25, 2021 and supplements as follows: In addition to the Preliminary Statement and General Objections, which are incorporated herein by this reference, Brocade objects to this Request as vague, ambiguous, compound, and overbroad, particularly as to SNMP's definition of "Brocade," "SNMP Research," "SNMP Research Software," the vague terms "concerning" and "any third party" and "this

litigation,” the request for “all Communications” with “any third party” without further specification, and the overbroad time period. Under SNMP’s definitions,. Under SNMP’s definitions incorporated into this Request, Brocade is defined to include, *inter alia*, all affiliated entities, including co-defendant Broadcom Inc. SNMP Research is similarly defined to include, *inter alia*, both Plaintiffs’ predecessors, agents, representatives, divisions, and subsidiaries, which are unknown to Brocade. The definition of SNMP Research Software incorporates these overbroad entity definitions, and also includes software, Source Code and Derivative Works that are beyond the scope of this lawsuit. Conducting a search of such broad scope under SNMP’s defined and undefined terms would be unduly burdensome and then listing all Communications would be unduly burdensome. The Request seeks Communications that are irrelevant and not proportional to the needs of the case. Brocade further objects to this Request as premature as it first requires review of information in SNMP’s possession, including its software and/or source code. Brocade further objects to this Request as seeking premature expert discovery, analysis, and opinion.

Brocade further objects to this Request as it requires the disclosure of confidential and proprietary information, documents, and tangible things of Brocade and third parties. Brocade further objects to this Requests to the extent the documents sought are not in Brocade’s possession, custody, or control and are in the possession, custody, or control of third parties. Brocade further objects to this Request to the extent the documents sought are already in Plaintiffs’ possession. Brocade further objects to this Request as this jurisdiction is an improper venue for this action.

Brocade objects to this Request to the extent it seeks disclosure of any information, documents, or other tangible things that is protected by any applicable privilege or protection, including without limitation the attorney-client privilege, the attorney work product doctrine, the

joint client privilege, the joint defense or common interest privilege, the constitutional right to privacy, and the Federal Rules of Civil Procedure.

Subject to and without waiving these objections, Brocade responds as follows:

Brocade is willing to meet and confer regarding the meaning and scope of this request.

REQUEST FOR PRODUCTION NO. 34:

All internal Communications at Brocade that Relate to any Communication received by SNMP Research concerning breach of the License Agreement or alleged acts of infringement.

SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 34:

Brocade incorporates its original objections to this Request served on January 25, 2021 and supplements as follows: In addition to the Preliminary Statement and General Objections, which are incorporated herein by this reference, Brocade objects to this Request as vague, ambiguous, compound, and overbroad, particularly as to SNMP's definition of "Brocade," "SNMP Research," and "Relate to," the vague and undefined terms "Communication received by SNMP Research" and "concerning" and "alleged acts of infringement," the confusing and overbroad request for "all internal Communications" relating to "any" Communication received by *Plaintiffs* concerning their own claims, and the overbroad time period. . Under SNMP's definitions incorporated into this Request, Brocade is defined to include, *inter alia*, all affiliated entities, including co-defendant Broadcom Inc. SNMP Research is similarly defined to include, *inter alia*, both Plaintiffs' predecessors, agents, representatives, divisions, and subsidiaries, which are unknown to Brocade. Conducting a search of such broad scope under SNMP's defined and undefined terms would be unduly burdensome and then listing all Communications would be unduly burdensome. The

Request as framed seeks documents that are irrelevant and not proportional to the needs of the case.

Brocade further objects to this Request as it requires the disclosure of confidential and proprietary information, documents, and tangible things of Brocade and third parties. Brocade further objects to this Requests to the extent the documents sought are not in Brocade's possession, custody, or control and are in the possession, custody, or control of third parties. Brocade further objects to this Request to the extent the documents sought are already in Plaintiffs' possession. Brocade further objects to this Request as this jurisdiction is an improper venue for this action.

Brocade objects to this Request to the extent it seeks disclosure of any information, documents, or other tangible things that is protected by any applicable privilege or protection, including without limitation the attorney-client privilege, the attorney work product doctrine, the joint client privilege, the joint defense or common interest privilege, the constitutional right to privacy, and the Federal Rules of Civil Procedure.

Subject to and without waiving these objections, Brocade responds as follows:

Brocade is willing to meet and confer regarding this Request.

REQUEST FOR PRODUCTION NO. 35:

All Documents reflecting the results of any searches of Brocade software for SNMP Research Software in Brocade Products, the protocols behind such searches, all findings and analysis, and all Communications concerning same.

SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 35:

Brocade incorporates its original objections to this Request served on January 25, 2021 and supplements as follows: In addition to the Preliminary Statement and General Objections, which

are incorporated herein by this reference, Brocade objects to this Request as vague, ambiguous, compound, and overbroad, particularly as to SNMP's definition of "Brocade," "SNMP Research," "Products," and "SNMP Research Software," the vague and undefined terms "protocols" and "findings and analysis" and "concerning," and the overbroad time period. Under SNMP's definitions incorporated into this Request, Brocade is defined to include, *inter alia*, all affiliated entities, including co-defendant Broadcom Inc. SNMP Research is similarly defined to include, *inter alia*, both Plaintiffs' predecessors, agents, representatives, divisions, and subsidiaries, which are unknown to Brocade. The definition of SNMP Research Software incorporates these overbroad entity definitions, and also includes software, Source Code and Derivative Works that are beyond the scope of this lawsuit. Conducting a search of such broad scope under SNMP's defined and undefined terms would be unduly burdensome and then listing all Communications would be unduly burdensome. The Request as framed seeks documents that are irrelevant and not proportional to the needs of the case. Brocade further objects to this Request as premature as it first requires review of information in SNMP's possession, including its software and/or source code. Brocade further objects to this Request as seeking premature expert discovery, analysis, and opinion.

Brocade further objects to this Request as it requires the disclosure of confidential and proprietary information, documents, and tangible things of Brocade and third parties. Brocade further objects to this Requests to the extent the documents sought are not in Brocade's possession, custody, or control and are in the possession, custody, or control of third parties. Brocade further objects to this Request to the extent the documents sought are already in Plaintiffs' possession. Brocade further objects to this Request as this jurisdiction is an improper venue for this action.

Brocade objects to this Request to the extent it seeks disclosure of any information, documents, or other tangible things that is protected by any applicable privilege or protection, including without limitation the attorney-client privilege, the attorney work product doctrine, the joint client privilege, the joint defense or common interest privilege, the constitutional right to privacy, and the Federal Rules of Civil Procedure.

Subject to and without waiving these objections, Brocade responds as follows:

Brocade is willing to meet and confer regarding the meaning and scope of this Request.

REQUEST FOR PRODUCTION NO. 36:

All Documents Relating to revenue information for each and every Product Identified in response to Interrogatory numbers 1 and 2 dating from the year 2017 and continuing to the present.

SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 36:

Brocade incorporates its original objections to this Request served on January 25, 2021 and supplements as follows: In addition to the Preliminary Statement, General Objections, and objections to Interrogatory numbers 1 and 2, which are incorporated herein by this reference, Brocade objects to this Request as vague, ambiguous, compound, and overbroad, particularly as to SNMP's definition of "Product," "Identified," "all Documents," and "Relating to," the vague term "revenue information," the overbroad time period, the overbroad request for "All Documents Relating to" without further specification, and the categories required to be identified by those Interrogatories. Under SNMP's definitions incorporated into this Request by reference to Interrogatory numbers 1 and 2, Brocade is defined to include, *inter alia*, all affiliated entities, including co-defendant Broadcom Inc. SNMP Research is similarly defined to include, *inter alia*, both Plaintiffs' predecessors, agents, representatives, divisions, and subsidiaries, which are

unknown to Brocade. The definition of SNMP Research Software incorporates these overbroad entity definitions, and also includes software, Source Code and Derivative Works that are beyond the scope of this lawsuit. Conducting a search of such broad scope under SNMP's defined and undefined terms would be unduly burdensome. The Request as framed seeks documents that are irrelevant and not proportional to the needs of the case. The Request for "All Documents Relating to revenue information" is grossly overbroad, vague, not reasonably particular, and seeks information that is irrelevant to the claims and defenses in this action. Brocade further objects to this Request as premature as it first requires review of information in SNMP's possession, including its software and/or source code. Brocade further objects to this Request as seeking premature expert discovery, analysis, and opinion.

Brocade further objects to this Request as it requires the disclosure of confidential and proprietary information, documents, and tangible things of Brocade and third parties. Brocade further objects to this Requests to the extent the documents sought are not in Brocade's possession, custody, or control and are in the possession, custody, or control of third parties. Brocade further objects to this Request to the extent the documents sought are already in Plaintiffs' possession. Brocade further objects to this Request as this jurisdiction is an improper venue for this action.

Brocade objects to this Request to the extent it seeks disclosure of any information, documents, or other tangible things that is protected by any applicable privilege or protection, including without limitation the attorney-client privilege, the attorney work product doctrine, the joint client privilege, the joint defense or common interest privilege, the constitutional right to privacy, and the Federal Rules of Civil Procedure.

Subject to and without waiving these objections, Brocade responds as follows:

Brocade will produce, on a rolling basis, non-privileged documents, to the extent such documents exist, are within Brocade's possession, custody, or control, have not already been produced, and are located after a reasonably diligent search, that are sufficient to show Brocade's revenue for the products listed in response to Interrogatory numbers 1 and 2 after July 25, 2019.

REQUEST FOR PRODUCTION NO. 37:

All Documents Relating to profit and loss analysis for all Products Identified in response to Interrogatory numbers 1 and 2 dating from the year 2017 and continuing to the present.

SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 37:

Brocade incorporates its original objections to this Request served on January 25, 2021 and supplements as follows: In addition to the Preliminary Statement, General Objections, the objections to Interrogatory numbers 1 and 2, which are incorporated herein by this reference, Brocade objects to this Request as vague, ambiguous, compound, and overbroad, particularly as to SNMP's definition of "Product," "Identified," and "Relating to," the vague term "profit and loss analysis," the overbroad time period, and the categories required to be identified by the Interrogatories. Under SNMP's definitions incorporated into this Request by reference to Interrogatory numbers 1 and 2, Brocade is defined to include, *inter alia*, all affiliated entities, including co-defendant Broadcom Inc. SNMP Research is similarly defined to include, *inter alia*, both Plaintiffs' predecessors, agents, representatives, divisions, and subsidiaries, which are unknown to Brocade. The definition of SNMP Research Software incorporates these overbroad entity definitions, and also includes software, Source Code and Derivative Works that are beyond the scope of this lawsuit. Conducting a search of such broad scope under SNMP's defined and undefined terms would be unduly burdensome. The Request as framed seeks documents that are

irrelevant and not proportional to the needs of the case. The Request for “All Documents Relating to profit and loss analysis” is grossly overbroad, vague, not reasonably particular, and seeks information that is irrelevant to the claims and defenses in this action. Brocade further objects to this Request as premature as it first requires review of information in SNMP’s possession, including its software and/or source code. Brocade further objects to this Request as seeking premature expert discovery, analysis, and opinion.

Brocade further objects to this Request as it requires the disclosure of confidential and proprietary information, documents, and tangible things of Brocade and third parties. Brocade further objects to this Requests to the extent the documents sought are not in Brocade’s possession, custody, or control and are in the possession, custody, or control of third parties. Brocade further objects to this Request to the extent the documents sought are already in Plaintiffs’ possession. Brocade further objects to this Request as this jurisdiction is an improper venue for this action.

Brocade objects to this Request to the extent it seeks disclosure of any information, documents, or other tangible things that is protected by any applicable privilege or protection, including without limitation the attorney-client privilege, the attorney work product doctrine, the joint client privilege, the joint defense or common interest privilege, the constitutional right to privacy, and the Federal Rules of Civil Procedure.

Subject to and without waiving these objections, Brocade responds as follows:

Brocade will produce, on a rolling basis, non-privileged documents, to the extent such documents exist, are within Brocade’s possession, custody, or control, have not already been produced, and are located after a reasonably diligent search, that are sufficient to show Brocade’s profits and losses for the products listed in response to Interrogatory numbers 1 and 2 after July 25, 2019.

REQUEST FOR PRODUCTION NO. 38:

All Documents concerning any analysis, discussion, or Communication about whether SNMP Research Software may be contained or used in any Brocade Product under the License Agreement or otherwise.

SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 38:

Brocade incorporates its original objections to this Request served on January 25, 2021 and supplements as follows: In addition to the Preliminary Statement and General Objections, which are incorporated herein by this reference, Brocade objects to this Request as vague, ambiguous, compound, and overbroad, particularly as to SNMP's definition of "Brocade," "Product," and "SNMP Research Software," the vague terms "concerning," "analysis," and "discussion," the overbroad request for "All Documents concerning any" without further specification, and the overbroad time period. Under SNMP's definitions incorporated into this Request, Brocade is defined to include, *inter alia*, all affiliated entities, including co-defendant Broadcom Inc. SNMP Research is similarly defined to include, *inter alia*, both Plaintiffs' predecessors, agents, representatives, divisions, and subsidiaries, which are unknown to Brocade. The definition of SNMP Research Software incorporates these overbroad entity definitions, and also includes software, Source Code and Derivative Works that are beyond the scope of this lawsuit. Conducting a search of such broad scope under SNMP's defined and undefined terms would be unduly burdensome and then listing all Communications would be unduly burdensome. The Request as framed seeks documents that are irrelevant and not proportional to the needs of the case. Brocade further objects to this Request as premature as it first requires review of information in SNMP's

possession, including its software and/or source code. Brocade further objects to this Request as seeking premature expert discovery, analysis, and opinion.

Brocade further objects to this Request as it requires the disclosure of confidential and proprietary information, documents, and tangible things of Brocade and third parties. Brocade further objects to this Requests to the extent the documents sought are not in Brocade's possession, custody, or control and are in the possession, custody, or control of third parties. Brocade further objects to this Request to the extent the documents sought are already in Plaintiffs' possession. Brocade further objects to this Request as this jurisdiction is an improper venue for this action.

Brocade objects to this Request to the extent it seeks disclosure of any information, documents, or other tangible things that is protected by any applicable privilege or protection, including without limitation the attorney-client privilege, the attorney work product doctrine, the joint client privilege, the joint defense or common interest privilege, the constitutional right to privacy, and the Federal Rules of Civil Procedure.

Subject to and without waiving these objections, Brocade responds as follows:

For the purposes of these objections and responses, Brocade construes the term "Brocade" to mean only the specific entity named as a defendant in this action, Brocade Communications Systems LLC. Pursuant to the stipulation of the parties, and in the interest of proceeding with discovery despite Plaintiffs' overbroad and vague definitions, Brocade limited its response to Interrogatory number 1 to the products identified in Paragraph 64 of the Complaint (ECF No. 1). In so doing, Brocade does not concede that these products contain any SNMP Research software, including the software listed in Paragraph 33, Table 1 of the Complaint (ECF No. 1) or any other copyrighted works held by SNMP Research. Brocade will produce, on a rolling basis, non-privileged documents, to the extent such documents exist, are within Brocade's possession,

custody, or control, have not already been produced, and are located after a reasonably diligent search, concerning whether Plaintiff's software could be used in the products identified in Paragraph 64 of the Complaint after July 25, 2019.

REQUEST FOR PRODUCTION NO. 39:

Brocade's Document retention policy.

SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 39:

Brocade incorporates its original objections to this Request served on January 25, 2021 and supplements as follows: In addition to the Preliminary Statement and General Objections, which are incorporated herein by this reference, Brocade objects to this Request as vague, ambiguous, compound, and overbroad, particularly as to SNMP's definition of "Brocade," the vague term "retention policy," and the overbroad time period. Under SNMP's definitions incorporated into this Request, Brocade is defined to include, *inter alia*, all affiliated entities, including co-defendant Broadcom Inc. Conducting a search of such broad scope under SNMP's defined and undefined terms would be unduly burdensome. The Request as framed seeks documents that are irrelevant and not proportional to the needs of the case.

Brocade further objects to this Request as it requires the disclosure of confidential and proprietary information, documents, and tangible things of Brocade and third parties. Brocade further objects to this Request as this jurisdiction is an improper venue for this action.

Brocade objects to this Request to the extent it seeks disclosure of any information, documents, or other tangible things that is protected by any applicable privilege or protection, including without limitation the attorney-client privilege, the attorney work product doctrine, the

joint client privilege, the joint defense or common interest privilege, the constitutional right to privacy, and the Federal Rules of Civil Procedure.

Subject to and without waiving these objections, Brocade responds as follows:

For the purposes of these objections and responses, Brocade construes the term “Brocade” to mean only the specific entity named as a defendant in this action, Brocade Communications Systems LLC. Brocade will produce, on a rolling basis, non-privileged documents, to the extent such documents exist, are within Brocade’s possession, custody, or control, have not already been produced, and are located after a reasonably diligent search, that constitute Brocade’s document retention policy.

REQUEST FOR PRODUCTION NO. 40:

All Documents Relating to the destruction of Documents within Brocade that may be relevant to the claims of SNMP Research.

SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 40:

Brocade incorporates its original objections to this Request served on January 25, 2021 and supplements as follows: In addition to the Preliminary Statement and General Objections, which are incorporated herein by this reference, Brocade objects to this Request as vague, ambiguous, compound, and overbroad, particularly as to SNMP’s definition of “Brocade,” “Relating to,” and “SNMP Research,” the vague terms “that may be relevant to the claims” and “destruction” and “within Brocade,” the overbroad request for “All Documents Relating to” without further specification, and the overbroad time period. Under SNMP’s definitions incorporated into this Request, Brocade is defined to include, *inter alia*, all affiliated entities, including co-defendant Broadcom Inc. SNMP Research is similarly defined to include, *inter alia*, both Plaintiffs’

predecessors, agents, representatives, divisions, and subsidiaries, which are unknown to Brocade. Conducting a search of such broad scope under SNMP's defined and undefined terms would be unduly burdensome. The Request as framed seeks documents that are irrelevant and not proportional to the needs of the case. Moreover, this Request does not specify any Documents for which SNMP believes destruction "may be relevant" to its claims.

Brocade further objects to this Request as it requires the disclosure of confidential and proprietary information, documents, and tangible things of Brocade and third parties. Brocade further objects to this Requests to the extent the documents sought are not in Brocade's possession, custody, or control and are in the possession, custody, or control of third parties. Brocade further objects to this Request to the extent the documents sought are already in Plaintiffs' possession. Brocade further objects to this Request as this jurisdiction is an improper venue for this action.

Brocade objects to this Request to the extent it seeks disclosure of any information, documents, or other tangible things that is protected by any applicable privilege or protection, including without limitation the attorney-client privilege, the attorney work product doctrine, the joint client privilege, the joint defense or common interest privilege, the constitutional right to privacy, and the Federal Rules of Civil Procedure.

Subject to and without waiving these objections, Brocade responds as follows:

For the purposes of these objections and responses, Brocade construes the term "Brocade" to mean only the specific entity named as a defendant in this action, Brocade Communications Systems LLC. Brocade will produce, on a rolling basis, non-privileged documents, to the extent such documents exist, are within Brocade's possession, custody, or control, have not already been produced, and are located after a reasonably diligent search, concerning the destruction of

documents within Brocade relevant to the claims in this case.

REQUEST FOR PRODUCTION NO. 41:

A copy of Your organization and governing Documents, including but not limited to any operating agreement and amendments to it.

SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 41:

Brocade incorporates its original objections to this Request served on January 25, 2021 and supplements as follows: In addition to the Preliminary Statement and General Objections, which are incorporated herein by this reference, Brocade objects to this Request as vague, ambiguous, compound, and overbroad, particularly as to SNMP's definition of "Your," the vague terms "organization" and "governing Documents," and the overbroad time period. Under SNMP's definitions incorporated into this Request, "Your" is defined to include, *inter alia*, all affiliated entities, including co-defendant Broadcom Inc. Conducting a search of such broad scope under SNMP's defined and undefined terms would be unduly burdensome. The Request as framed seeks documents that are irrelevant and not proportional to the needs of the case.

Brocade further objects to this Request as it requires the disclosure of confidential and proprietary information, documents, and tangible things of Brocade and third parties. Brocade further objects to this Requests to the extent the documents sought are not in Brocade's possession, custody, or control and are in the possession, custody, or control of third parties. Brocade further objects to this Request to the extent the documents sought are already in Plaintiffs' possession. Brocade further objects to this Request as this jurisdiction is an improper venue for this action.

Brocade objects to this Request to the extent it seeks disclosure of any information, documents, or other tangible things that is protected by any applicable privilege or protection,

including without limitation the attorney-client privilege, the attorney work product doctrine, the joint client privilege, the joint defense or common interest privilege, the constitutional right to privacy, and the Federal Rules of Civil Procedure.

Subject to and without waiving these objections, Brocade responds as follows:

Brocade is willing to meet and confer regarding the scope and relevance of this Request.

REQUEST FOR PRODUCTION NO. 42:

Copies of Your organizational and governing Documents, including but not limited to any operating agreement(s) or amendment(s) from October 1, 2017 to the present.

SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 42:

Brocade incorporates its original objections to this Request served on January 25, 2021 and supplements as follows: In addition to the Preliminary Statement and General Objections, which are incorporated herein by this reference, Brocade objects to this Request as vague, ambiguous, compound, and overbroad, particularly as to SNMP's definition of "Your," the vague terms "organizational" and "governing Documents," and the overbroad time period. Under SNMP's definitions incorporated into this Request, Brocade is defined to include, *inter alia*, all affiliated entities, including co-defendant Broadcom Inc. Conducting a search of such broad scope under SNMP's defined and undefined terms would be unduly burdensome. The Request as framed seeks documents that are irrelevant and not proportional to the needs of the case.

Brocade further objects to this Request as it requires the disclosure of confidential and proprietary information, documents, and tangible things of Brocade and third parties. Brocade further objects to this Requests to the extent the documents sought are not in Brocade's possession, custody, or control and are in the possession, custody, or control of third parties. Brocade further

objects to this Request to the extent the documents sought are already in Plaintiffs' possession. Brocade further objects to this Request as this jurisdiction is an improper venue for this action.

Brocade objects to this Request to the extent it seeks disclosure of any information, documents, or other tangible things that is protected by any applicable privilege or protection, including without limitation the attorney-client privilege, the attorney work product doctrine, the joint client privilege, the joint defense or common interest privilege, the constitutional right to privacy, and the Federal Rules of Civil Procedure.

Subject to and without waiving these objections, Brocade responds as follows:

Brocade is willing to meet and confer regarding the scope and relevance of this Request.

REQUEST FOR PRODUCTION NO. 43:

Your financial statements, including but not limited to any balance sheets, income statements, or similar Documents, from October 1, 2017 to the present.

SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 43:

Brocade incorporates its original objections to this Request served on January 25, 2021 and supplements as follows: In addition to the Preliminary Statement and General Objections, which are incorporated herein by this reference, Brocade objects to this Request as vague, ambiguous, compound, and overbroad, particularly as to SNMP's definition of "Your," the vague terms "or similar Documents," and the overbroad time period. . Under SNMP's definitions incorporated into this Request, Brocade is defined to include, *inter alia*, all affiliated entities, including co-defendant Broadcom Inc. Conducting a search of such broad scope under SNMP's defined and undefined terms would be unduly burdensome. The Request seeks documents that are irrelevant

and not proportional to the needs of the case. The Request is not tied to any claims or defenses in this case.

Brocade further objects to this Request as it requires the disclosure of confidential and proprietary information, documents, and tangible things of Brocade and third parties. Brocade further objects to this Requests to the extent the documents sought are not in Brocade's possession, custody, or control and are in the possession, custody, or control of third parties. Brocade further objects to this Request to the extent the documents sought are already in Plaintiffs' possession. Brocade further objects to this Request as this jurisdiction is an improper venue for this action.

Brocade objects to this Request to the extent it seeks disclosure of any information, documents, or other tangible things that is protected by any applicable privilege or protection, including without limitation the attorney-client privilege, the attorney work product doctrine, the joint client privilege, the joint defense or common interest privilege, the constitutional right to privacy, and the Federal Rules of Civil Procedure.

Subject to and without waiving these objections, Brocade responds as follows:

For the purposes of these objections and responses, Brocade construes the term "Your" to mean only the specific entity named as a defendant in this action, Brocade Communications Systems LLC. Brocade will produce, on a rolling basis, non-privileged documents, to the extent such documents exist, are within Brocade's possession, custody, or control, have not already been produced, and are located after a reasonably diligent search, that are sufficient to show Brocade's revenues, costs, profits and losses for the products listed in response to Interrogatory numbers 1 and 2 after July 25, 2019.

REQUEST FOR PRODUCTION NO. 44:

All advertising materials, marketing materials, brochures, or pamphlets, and other such Documents of any kind concerning and discussing the use of SNMP Research Software in Brocade Products or Partner Products.

SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 44:

Brocade incorporates its original objections to this Request served on January 25, 2021 and supplements as follows: In addition to the Preliminary Statement and General Objections, which are incorporated herein by this reference, Brocade objects to this Request as vague, ambiguous, compound, and overbroad, particularly as to SNMP's definition of "Brocade," "Products," "Partner Products," and "SNMP Research Software," the overbroad request for "all," vague terms "advertising materials," "marketing materials," "brochures," "pamphlets," "other such Documents of any kind" "concerning," "discussing," and "the use," and the overbroad time period. Under SNMP's definitions incorporated into this Request, Brocade is defined to include, *inter alia*, all affiliated entities, including co-defendant Broadcom Inc. SNMP Research is similarly defined to include, *inter alia*, both Plaintiffs' predecessors, agents, representatives, divisions, and subsidiaries, which are unknown to Brocade. The definition of SNMP Research Software incorporates these overbroad entity definitions, and also includes software, Source Code and Derivative Works that are beyond the scope of this lawsuit. Conducting a search of such broad scope under SNMP's defined and undefined terms would be unduly burdensome. The Request as framed seeks documents that are irrelevant and not proportional to the needs of the case. Brocade further objects to this Request as premature as it first requires review of information in SNMP's possession, including its software and/or source code. Brocade further objects to this Request as seeking premature expert discovery, analysis, and opinion.

Brocade further objects to this Request as it requires the disclosure of confidential and proprietary information, documents, and tangible things of Brocade and third parties. Brocade further objects to this Requests to the extent the documents sought are not in Brocade's possession, custody, or control and are in the possession, custody, or control of third parties. Brocade further objects to this Request to the extent the documents sought are already in Plaintiffs' possession. Brocade further objects to this Request as this jurisdiction is an improper venue for this action.

Brocade objects to this Request to the extent it seeks disclosure of any information, documents, or other tangible things that is protected by any applicable privilege or protection, including without limitation the attorney-client privilege, the attorney work product doctrine, the joint client privilege, the joint defense or common interest privilege, the constitutional right to privacy, and the Federal Rules of Civil Procedure.

Subject to and without waiving these objections, Brocade responds as follows:

For the purposes of these objections and responses, Brocade construes the term "Brocade" to mean only the specific entity named as a defendant in this action, Brocade Communications Systems LLC. Pursuant to the stipulation of the parties, and in the interest of proceeding with discovery despite Plaintiffs' overbroad and vague definitions, Brocade limited its response to Interrogatory number 1 to the products identified in Paragraph 64 of the Complaint (ECF No. 1). In so doing, Brocade does not concede that these products contain any SNMP Research software, including the software listed in Paragraph 33, Table 1 of the Complaint (ECF No. 1) or any other copyrighted works held by SNMP Research. Brocade will produce, on a rolling basis, non-privileged advertising materials, to the extent such documents exist, are within Brocade's possession, custody, or control, have not already been produced, and are located after a reasonably

diligent search, discussing the use of Plaintiff's software in the products listed in Paragraph 64 of the Complaint after July 25, 2019.

REQUEST FOR PRODUCTION NO. 45:

All Documents containing financial analysis of the benefit of use of SNMP Research Software in any Brocade Product.

SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 45:

Brocade incorporates its original objections to this Request served on January 25, 2021 and supplements as follows: In addition to the Preliminary Statement and General Objections, which are incorporated herein by this reference, Brocade objects to this Request as vague, ambiguous, compound, and overbroad, particularly as to SNMP's definition of "Brocade," "Product," and "SNMP Research Software," the vague terms "financial analysis" and "benefit of use," the overbroad request for "all Documents containing" without further specification, and the overbroad time period. Under SNMP's definitions incorporated into this Request, Brocade is defined to include, *inter alia*, all affiliated entities, including co-defendant Broadcom Inc. SNMP Research is similarly defined to include, *inter alia*, both Plaintiffs' predecessors, agents, representatives, divisions, and subsidiaries, which are unknown to Brocade. The definition of SNMP Research Software incorporates these overbroad entity definitions, and also includes software, Source Code and Derivative Works that are beyond the scope of this lawsuit. Conducting a search for documents of such broad scope under SNMP's defined and undefined terms would be unduly burdensome. The Request as framed seeks documents that are irrelevant and not proportional to the needs of the case. Brocade further objects to this Request as premature as it first requires

review of information in SNMP's possession, including its software and/or source code. Brocade further objects to this Request as seeking premature expert discovery, analysis, and opinion.

Brocade further objects to this Request as it requires the disclosure of confidential and proprietary information, documents, and tangible things of Brocade and third parties. Brocade further objects to this Requests to the extent the documents sought are not in Brocade's possession, custody, or control and are in the possession, custody, or control of third parties. Brocade further objects to this Request to the extent the documents sought are already in Plaintiffs' possession. Brocade further objects to this Request as this jurisdiction is an improper venue for this action.

Brocade objects to this Request to the extent it seeks disclosure of any information, documents, or other tangible things that is protected by any applicable privilege or protection, including without limitation the attorney-client privilege, the attorney work product doctrine, the joint client privilege, the joint defense or common interest privilege, the constitutional right to privacy, and the Federal Rules of Civil Procedure.

Subject to and without waiving these objections, Brocade responds as follows:

For the purposes of these objections and responses, Brocade construes the term "Brocade" to mean only the specific entity named as a defendant in this action, Brocade Communications Systems LLC. Pursuant to the stipulation of the parties, and in the interest of proceeding with discovery despite Plaintiffs' overbroad and vague definitions, Brocade limited its response to Interrogatory number 1 to the products identified in Paragraph 64 of the Complaint (ECF No. 1). In so doing, Brocade does not concede that these products contain any SNMP Research software, including the software listed in Paragraph 33, Table 1 of the Complaint (ECF No. 1) or any other copyrighted works held by SNMP Research. Brocade will produce, on a rolling basis, non-privileged documents, to the extent such documents exist, are within Brocade's possession,

custody, or control, have not already been produced, and are located after a reasonably diligent search, containing financial analysis of the benefit of use of Plaintiff's software in the products listed in Paragraph 64 of the Complaint.

REQUEST FOR PRODUCTION NO. 46:

All financial Documents Relating to Brocades's profits and losses from October 1, 2017 continuing to the present.

SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 46:

Brocade incorporates its original objections to this Request served on January 25, 2021 and supplements as follows: In addition to the Preliminary Statement and General Objections, which are incorporated herein by this reference, Brocade objects to this Request as vague, ambiguous, duplicative, compound, and overbroad, particularly as to SNMP's definitions of "Brocade," "Documents," and "Relating To," the vague term "All financial Documents" and "profits and losses," the overbroad request for "All financial Documents Relating to" without further specification, and the overbroad time period. Under SNMP's definitions incorporated into this Request, Brocade is defined to include, *inter alia*, all affiliated entities, including co-defendant Broadcom Inc. Conducting a search for documents of such broad scope under SNMP's defined and undefined terms would be unduly burdensome. The Request as framed seeks documents that are irrelevant and not proportional to the needs of the case. The Request is not tied to any claims or defenses in this case.

Brocade further objects to this Request as it requires the disclosure of confidential and proprietary information, documents, and tangible things of Brocade and third parties. Brocade further objects to this Requests to the extent the documents sought are not in Brocade's possession,

custody, or control and are in the possession, custody, or control of third parties. Brocade further objects to this Request to the extent the documents sought are already in Plaintiffs' possession. Brocade further objects to this Request as this jurisdiction is an improper venue for this action.

Brocade objects to this Request to the extent it seeks disclosure of any information, documents, or other tangible things that is protected by any applicable privilege or protection, including without limitation the attorney-client privilege, the attorney work product doctrine, the joint client privilege, the joint defense or common interest privilege, the constitutional right to privacy, and the Federal Rules of Civil Procedure.

Subject to and without waiving these objections, Brocade responds as follows:

For the purposes of these objections and responses, Brocade construes the term "Brocade" to mean only the specific entity named as a defendant in this action, Brocade Communications Systems LLC. Brocade will produce, on a rolling basis, non-privileged documents, to the extent such documents exist, are within Brocade's possession, custody, or control, have not already been produced, and are located after a reasonably diligent search, that are sufficient to show Brocade's profits and losses for the products listed in response to Interrogatory numbers 1 and 2 after July 25, 2019.

REQUEST FOR PRODUCTION NO. 47:

All financial Documents reflecting Your current assets, liabilities, and income.

SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 47:

Brocade incorporates its original objections to this Request served on January 25, 2021 and supplements as follows: In addition to the Preliminary Statement and General Objections, which are incorporated herein by this reference, Brocade objects to this Request as vague, ambiguous,

compound, and overbroad, particularly as to SNMP's definition of "Your," the vague and overbroad terms "all financial Documents," "current assets," "liabilities," and "income," the overbroad request for "all financial Documents reflecting" without further specification, and the overbroad time period. Under SNMP's definitions incorporated into this Request, Brocade is defined to include, *inter alia*, all affiliated entities, including co-defendant Broadcom Inc. Conducting a search for documents of such broad scope under SNMP's defined and undefined terms would be unduly burdensome. The Request as framed seeks documents that are irrelevant and not proportional to the needs of the case. The Request is not tied to any claims or defenses in this case.

Brocade further objects to this Request as it requires the disclosure of confidential and proprietary information, documents, and tangible things of Brocade and third parties. Brocade further objects to this Requests to the extent the documents sought are not in Brocade's possession, custody, or control and are in the possession, custody, or control of third parties. Brocade further objects to this Request to the extent the documents sought are already in Plaintiffs' possession. Brocade further objects to this Request as this jurisdiction is an improper venue for this action.

Brocade objects to this Request to the extent it seeks disclosure of any information, documents, or other tangible things that is protected by any applicable privilege or protection, including without limitation the attorney-client privilege, the attorney work product doctrine, the joint client privilege, the joint defense or common interest privilege, the constitutional right to privacy, and the Federal Rules of Civil Procedure.

REQUEST FOR PRODUCTION NO. 48:

A copy of each and every Document which has an agreement for Brocade Products that contain SNMP Research Software under which Brocade placed Source Code into escrow and all Documents that show the customers to which those agreements Relate.

SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 48:

Brocade incorporates its original objections to this Request served on January 25, 2021 and supplements as follows: In addition to the Preliminary Statement and General Objections, which are incorporated herein by this reference, Brocade objects to this Request as unintelligible, vague, ambiguous, compound, and overbroad, particularly as to SNMP's definitions of "Brocade," "Products," "Source Code," "each and every Document," "Relate," and "SNMP Research Software," the vague and undefined terms "placed Source Code into escrow" and "Document which has an agreement for" and "show the customers to which those agreements Relate" as used in this context, and the overbroad time period. Under SNMP's definitions incorporated into this Request, Brocade is defined to include, *inter alia*, all affiliated entities, including co-defendant Broadcom Inc. SNMP Research is similarly defined to include, *inter alia*, both Plaintiffs' predecessors, agents, representatives, divisions, and subsidiaries, which are unknown to Brocade. The definition of SNMP Research Software incorporates these overbroad entity definitions, and also includes software, Source Code and Derivative Works that are beyond the scope of this lawsuit. Conducting a search for documents of such broad scope under SNMP's defined and undefined terms would be unduly burdensome. The Request as framed seeks documents that are irrelevant and not proportional to the needs of the case. Brocade further objects to this Request as premature as it first requires review of information in SNMP's possession, including its software

and/or source code. Brocade further objects to this Request as seeking premature expert discovery, analysis, and opinion.

Brocade further objects to this Request as it requires the disclosure of confidential and proprietary information, documents, and tangible things of Brocade and third parties. Brocade further objects to this Requests to the extent the documents sought are not in Brocade's possession, custody, or control and are in the possession, custody, or control of third parties. Brocade further objects to this Request to the extent the documents sought are already in Plaintiffs' possession. Brocade further objects to this Request as this jurisdiction is an improper venue for this action.

Brocade objects to this Request to the extent it seeks disclosure of any information, documents, or other tangible things that is protected by any applicable privilege or protection, including without limitation the attorney-client privilege, the attorney work product doctrine, the joint client privilege, the joint defense or common interest privilege, the constitutional right to privacy, and the Federal Rules of Civil Procedure.

Subject to and without waiving the foregoing objections:

Brocade is willing to meet and confer regarding the meaning, relevance, and scope of this Request.

REQUEST FOR PRODUCTION NO. 49:

All distribution Documents sufficient to show the number of Products Identified in response to Interrogatory numbers 1 and 2 distributed, transferred, or otherwise disclosed to third parties, including the name of the party to whom the Product was distributed, by quarter, dating from January 1, 2017 to the present.

SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 49:

Brocade incorporates its original objections to this Request served on January 25, 2021 and supplements as follows: In addition to the Preliminary Statement, General Objections, the objections to Interrogatory numbers 1 and 2, which are incorporated herein by this reference, Brocade objects to this Request as vague, ambiguous, compound, and overbroad, particularly as to SNMP's definition of "Products," and "Identified," the vague terms "distribution Documents," "distributed," "transferred," and "otherwise disclosed," the vague and overbroad request for "all distribution Documents" without further specification, and the overbroad time period. Under SNMP's definitions incorporated into this Request by reference to Interrogatory numbers 1 and 2, Brocade is defined to include, *inter alia*, all affiliated entities, including co-defendant Broadcom Inc. SNMP Research is similarly defined to include, *inter alia*, both Plaintiffs' predecessors, agents, representatives, divisions, and subsidiaries, which are unknown to Brocade. The definition of SNMP Research Software incorporates these overbroad entity definitions, and also includes software, Source Code and Derivative Works that are beyond the scope of this lawsuit. Conducting a search for documents of such broad scope under SNMP's defined and undefined terms would be unduly burdensome. The Request as framed seeks documents that are irrelevant and not proportional to the needs of the case. Brocade further objects to this Request as premature as it first requires review of information in SNMP's possession, including its software and/or source code. Brocade further objects to this Request as seeking premature expert discovery, analysis, and opinion.

Brocade further objects to this Request as it requires the disclosure of confidential and proprietary information, documents, and tangible things of Brocade and third parties. Brocade further objects to this Requests to the extent the documents sought are not in Brocade's possession,

custody, or control and are in the possession, custody, or control of third parties. Brocade further objects to this Request to the extent the documents sought are already in Plaintiffs' possession. Brocade further objects to this Request as this jurisdiction is an improper venue for this action.

Brocade objects to this Request to the extent it seeks disclosure of any information, documents, or other tangible things that is protected by any applicable privilege or protection, including without limitation the attorney-client privilege, the attorney work product doctrine, the joint client privilege, the joint defense or common interest privilege, the constitutional right to privacy, and the Federal Rules of Civil Procedure.

Subject to and without waiving these objections, Brocade responds as follows:

Pursuant to the stipulation of the parties, and in the interest of proceeding with discovery despite Plaintiffs' overbroad and vague definitions, Brocade limited its response to Interrogatory number 1 to the products identified in Paragraph 64 of the Complaint (ECF No. 1). In so doing, Brocade does not concede that these products contain any SNMP Research software, including the software listed in Paragraph 33, Table 1 of the Complaint (ECF No. 1) or any other copyrighted works held by SNMP Research. Brocade will produce, on a rolling basis, non-privileged documents, to the extent such documents exist, are within Brocade's possession, custody, or control, have not already been produced, and are located after a reasonably diligent search, sufficient to show the number of products listed in the response to Interrogatory number 1 that were shipped to third parties after July 25, 2019.

REQUEST FOR PRODUCTION NO. 50:

All Documents Relating to any attempt by Brocade to cure breach(es) of the License Agreement.

SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 50:

Brocade incorporates its original objections to this Request served on January 25, 2021 and supplements as follows: In addition to the Preliminary Statement and General Objections, which are incorporated herein by this reference, Brocade objects to this Request as vague, ambiguous, compound, and overbroad, particularly as to SNMP's definition of "Brocade" and "Relating to," the vague and overbroad terms "any attempt to" and "cure breach(es)," the request for "All Documents Relating to" without further specification, and the overbroad time period. Under SNMP's definitions incorporated into this Request, Brocade is defined to include, *inter alia*, all affiliated entities, including co-defendant Broadcom Inc. Conducting a search for documents of such broad scope under SNMP's defined and undefined terms would be unduly burdensome. The Request as framed seeks documents that are irrelevant and not proportional to the needs of the case. This Request also calls for a legal conclusion and assumes facts not proven by Plaintiffs.

Brocade further objects to this Request as it requires the disclosure of confidential and proprietary information, documents, and tangible things of Brocade and third parties. Brocade further objects to this Requests to the extent the documents sought are not in Brocade's possession, custody, or control and are in the possession, custody, or control of third parties. Brocade further objects to this Request to the extent the documents sought are already in Plaintiffs' possession. Brocade further objects to this Request as this jurisdiction is an improper venue for this action.

Brocade objects to this Request to the extent it seeks disclosure of any information, documents, or other tangible things that is protected by any applicable privilege or protection, including without limitation the attorney-client privilege, the attorney work product doctrine, the joint client privilege, the joint defense or common interest privilege, the constitutional right to privacy, and the Federal Rules of Civil Procedure.

Subject to and without waiving these objections, Brocade responds as follows:

For the purposes of these objections and responses, Brocade construes the term “Brocade” to mean only the specific entity named as a defendant in this action, Brocade Communications Systems LLC. Brocade will produce, on a rolling basis, non-privileged documents, to the extent such documents exist, are within Brocade’s possession, custody, or control, have not already been produced, and are located after a reasonably diligent search, responsive to this Request.

REQUEST FOR PRODUCTION NO. 51:

All Documents Relating to the disclosure, licensing, sale, or transfer of SNMP Software to Extreme.

SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 51:

Brocade incorporates its original objections to this Request served on January 25, 2021 and supplements as follows: In addition to the Preliminary Statement and General Objections, which are incorporated herein by this reference, Brocade objects to this Request as vague, ambiguous, compound, and overbroad, particularly as to SNMP’s definition of “Extreme,” “Documents,” and “Relating to,” the undefined term “SNMP Software,” the vague terms “disclosure” and “transfer,” the request for “All Documents Relating to” without further specification, and the overbroad time period. SNMP Research is defined to include, *inter alia*, both Plaintiffs’ predecessors, agents, representatives, divisions, and subsidiaries, which are unknown to Brocade. The definition of SNMP Research Software incorporates these overbroad entity definitions, and also includes software, Source Code and Derivative Works that are beyond the scope of this lawsuit. Extreme is likewise broadly defined to include entities and individuals unknown to Brocade. Conducting a search for documents of such broad scope under SNMP’s defined and undefined terms would be

unduly burdensome. The Request as framed seeks documents that are irrelevant and not proportional to the needs of the case. Brocade further objects to this Request as premature as it first requires review of information in SNMP's possession, including its software and/or source code. Brocade further objects to this Request as seeking premature expert discovery, analysis, and opinion. This Request also seeks a legal conclusion and assumes facts not yet proven by Plaintiffs.

Brocade further objects to this Request as it requires the disclosure of confidential and proprietary information, documents, and tangible things of Brocade and third parties. Brocade further objects to this Requests to the extent the documents sought are not in Brocade's possession, custody, or control and are in the possession, custody, or control of third parties. Brocade further objects to this Request to the extent the documents sought are already in Plaintiffs' possession. Brocade further objects to this Request as this jurisdiction is an improper venue for this action.

Brocade objects to this Request to the extent it seeks disclosure of any information, documents, or other tangible things that is protected by any applicable privilege or protection, including without limitation the attorney-client privilege, the attorney work product doctrine, the joint client privilege, the joint defense or common interest privilege, the constitutional right to privacy, and the Federal Rules of Civil Procedure.

Subject to and without waiving these objections, Brocade responds as follows:

Brocade is willing to meet and confer regarding the meaning, relevance, and scope of this Request.

REQUEST FOR PRODUCTION NO. 52:

All Documents that compute or discuss the value of the assets in the disclosure, licensing, sale, and/or transfer from Brocade to Extreme (“Extreme Sale”), including but not limited to computations or discussions of purchase price allocation.

SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 52:

Brocade incorporates its original objections to this Request served on January 25, 2021 and supplements as follows: In addition to the Preliminary Statement and General Objections, which are incorporated herein by this reference, Brocade objects to this Request as vague, ambiguous, compound, and overbroad, particularly as to SNMP’s definition of “Brocade,” “all Documents,” and “Extreme,” the vague and overbroad terms “compute,” “discuss,” “value of the assets,” “disclosure,” “transfer,” and “discussions,” and the overbroad time period. Under SNMP’s definitions incorporated into this Request, Brocade is defined to include, *inter alia*, all affiliated entities, including co-defendant Broadcom Inc. Extreme is likewise broadly defined to include entities and individuals unknown to Brocade. Conducting a search for documents of such broad scope under SNMP’s defined and undefined terms would be unduly burdensome. The Request seeks documents that are irrelevant and not proportional to the needs of the case. This Request also seeks a legal conclusion, assumes facts not yet proven by Plaintiffs, and is not tied to the claims or defenses in this case.

Brocade further objects to this Request as it requires the disclosure of confidential and proprietary information, documents, and tangible things of Brocade and third parties. Brocade further objects to this Requests to the extent the documents sought are not in Brocade’s possession, custody, or control and are in the possession, custody, or control of third parties. Brocade further

objects to this Request to the extent the documents sought are already in Plaintiffs' possession. Brocade further objects to this Request as this jurisdiction is an improper venue for this action.

Brocade objects to this Request to the extent it seeks disclosure of any information, documents, or other tangible things that is protected by any applicable privilege or protection, including without limitation the attorney-client privilege, the attorney work product doctrine, the joint client privilege, the joint defense or common interest privilege, the constitutional right to privacy, and the Federal Rules of Civil Procedure.

Subject to and without waiving these objections, Brocade responds as follows:

Plaintiff does not identify what transfer to Extreme it is referring to. For the purposes of these objections and responses, Brocade construes the term "Brocade" to mean only the specific entity named as a defendant in this action, Brocade Communications Systems LLC. Brocade further construes this Request as seeking information about Extreme's acquisition of Brocade's data center switching, routing, and analytics business in October 2017. Brocade will produce, on a rolling basis, non-privileged documents, to the extent such documents exist, are within Brocade's possession, custody, or control, have not already been produced, and are located after a reasonably diligent search, sufficient to show the purchase price paid by Extreme for the business.

REQUEST FOR PRODUCTION NO. 53:

All Source Code disclosed, licensed, sold, transferred, or otherwise provided to Extreme as a part of the Extreme Sale.

SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 53:

Brocade incorporates its original objections to this Request served on January 25, 2021 and supplements as follows: In addition to the Preliminary Statement and General Objections, which

are incorporated herein by this reference, Brocade objects to this Request as vague, ambiguous, compound, and overbroad, particularly as to SNMP's definition of "Source Code" and "Extreme," the vague and overbroad terms "disclosed" and "transferred" and "otherwise provided," the request for "All Source Code" without further specification and untied to the claims and defenses in this case, and the overbroad time period. Under SNMP's definitions incorporated into this Request, Brocade is defined to include, *inter alia*, all affiliated entities, including co-defendant Broadcom Inc. Extreme is likewise broadly defined to include entities and individuals unknown to Brocade. Conducting a search for documents of such broad scope under SNMP's defined and undefined terms would be unduly burdensome. The Request seeks documents that are irrelevant and not proportional to the needs of the case. Brocade further objects to this Request as premature as it first requires review of information in SNMP's possession, including its software and/or source code. Brocade further objects to this Request as seeking premature expert discovery, analysis, and opinion. This Request also seeks a legal conclusion, assumes facts not yet proven by Plaintiffs, and is not tied to the claims or defenses in this case.

Brocade further objects to this Request as it requires the disclosure of confidential and proprietary information, documents, and tangible things of Brocade and third parties. Brocade further objects to this Requests to the extent the documents sought are not in Brocade's possession, custody, or control and are in the possession, custody, or control of third parties. Brocade further objects to this Request to the extent the documents sought are already in Plaintiffs' possession. Brocade further objects to this Request as this jurisdiction is an improper venue for this action.

Brocade objects to this Request to the extent it seeks disclosure of any information, documents, or other tangible things that is protected by any applicable privilege or protection, including without limitation the attorney-client privilege, the attorney work product doctrine, the

joint client privilege, the joint defense or common interest privilege, the constitutional right to privacy, and the Federal Rules of Civil Procedure.

Subject to and without waiving these objections, Brocade responds as follows:

Brocade is willing to meet and confer with Plaintiff regarding this Request.

REQUEST FOR PRODUCTION NO. 54:

All Documents and things that Brocade may seek to use at trial in this action.

SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 54:

Brocade incorporates its original objections to this Request served on January 25, 2021 and supplements as follows: In addition to the Preliminary Statement and General Objections, which are incorporated herein by this reference, Brocade objects to this Request as vague, ambiguous, compound, and overbroad, particularly as to SNMP’s definition of “Brocade,” the vague terms “and things” and “may seek to use.” Under SNMP’s definitions incorporated into this Request, Brocade is defined to include, *inter alia*, all affiliated entities, including co-defendant Broadcom Inc. Conducting a search for documents of such broad scope under SNMP’s defined and undefined terms would be unduly burdensome. The Request as framed seeks documents that are irrelevant and not proportional to the needs of the case. Brocade further objects to this Request as premature as a trial date has yet to be set and the parties agreed to a trial date in November 2022, and Brocade will first need to examine information in the possession of Plaintiffs, including their software, source code, copyright registrations and deposits, and relevant communications, among other things. Discovery is in its preliminary stages. Brocade further objects to this Request as seeking premature expert discovery, analysis, and opinion.

Brocade further objects to this Request as it requires the disclosure of confidential and proprietary information, documents, and tangible things of Brocade and third parties. Brocade further objects to this Requests to the extent the documents sought are not in Brocade's possession, custody, or control and are in the possession, custody, or control of third parties. Brocade further objects to this Request to the extent the documents sought are already in Plaintiffs' possession. Brocade further objects to this Request as this jurisdiction is an improper venue for this action.

Brocade objects to this Request to the extent it seeks disclosure of any information, documents, or other tangible things that is protected by any applicable privilege or protection, including without limitation the attorney-client privilege, the attorney work product doctrine, the joint client privilege, the joint defense or common interest privilege, the constitutional right to privacy, and the Federal Rules of Civil Procedure.

Subject to and without waiving the foregoing objections, Brocade responds as follows:

For the purposes of these objections and responses, Brocade construes the term "Brocade" to mean only the specific entity named as a defendant in this action, Brocade Communications Systems LLC. Although Brocade's investigation is ongoing and it has not yet identified the documents it may seek to use at trial in this litigation, Brocade will produce, on a rolling basis, non-privileged documents, to the extent such documents exist, are within Brocade's possession, custody, or control, have not already been produced, and are located after a reasonably diligent search, that are responsive to this Request as they are identified. Brocade does not, however, waive any right to rely on documents in this case that were not produced or that were not responsive to these Requests.

REQUEST FOR PRODUCTION NO. 55:

All Documents Relating to Broadcom Inc. sharing, either directly or indirectly, in the revenues, profits, or losses from the transfer (by disclosure, license, sale, or otherwise) of SNMP Research Software that was/is in the possession of Brocade to Extreme.

SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 55:

Brocade incorporates its original objections to this Request served on January 25, 2021 and supplements as follows: In addition to the Preliminary Statement and General Objections, which are incorporated herein by this reference, Brocade objects to this Request as vague, ambiguous, compound, and overbroad, particularly as to SNMP's definition of "Brocade," "Broadcom," "Extreme," "Relating to," and "SNMP Research Software," the vague and overbroad terms "sharing," "directly or indirectly," "from the transfer," "disclosure," "or otherwise," and "was/is in the possession of," and the overbroad time period. Under SNMP's definitions incorporated into this Request, Brocade is defined to include, *inter alia*, all affiliated entities, including co-defendant Broadcom Inc. This Request is nonsensical because SNMP has defined Brocade to include Broadcom and vice versa, as well as all other affiliated entities and more. SNMP Research is similarly defined to include, *inter alia*, both Plaintiffs' predecessors, agents, representatives, divisions, and subsidiaries, which are unknown to Brocade. The definition of SNMP Research Software incorporates these overbroad entity definitions, and also includes software, Source Code and Derivative Works that are beyond the scope of this lawsuit. Conducting a search for documents of such broad scope under SNMP's defined and undefined terms would be unduly burdensome. The definition of Extreme is similarly overbroad. The Request seeks documents that are irrelevant and not proportional to the needs of the case. Brocade further objects to this Request as premature as it first requires review of information in SNMP's possession, including its software

and/or source code. Brocade further objects to this Request as seeking premature expert discovery, analysis, and opinion. This Request also seeks a legal conclusion, assumes facts not yet proven by Plaintiffs, and is not tied to the claims or defenses in this case.

Brocade further objects to this Request as it requires the disclosure of confidential and proprietary information, documents, and tangible things of Brocade and third parties. Brocade further objects to this Requests to the extent the documents sought are not in Brocade's possession, custody, or control and are in the possession, custody, or control of third parties. Brocade further objects to this Request to the extent the documents sought are already in Plaintiffs' possession. Brocade further objects to this Request as this jurisdiction is an improper venue for this action.

Brocade objects to this Request to the extent it seeks disclosure of any information, documents, or other tangible things that is protected by any applicable privilege or protection, including without limitation the attorney-client privilege, the attorney work product doctrine, the joint client privilege, the joint defense or common interest privilege, the constitutional right to privacy, and the Federal Rules of Civil Procedure.

Subject to and without waiving the foregoing objections, Brocade responds as follows:

Brocade is willing to meet and confer with Plaintiff regarding this Request.

REQUEST FOR PRODUCTION NO. 56:

All Documents Relating to Broadcom Inc.'s financial interest in the transfer (by disclosure, license, sale, or otherwise) of SNMP Research Software that was/is in the possession of Brocade Extreme.

SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 56:

Brocade incorporates its original objections to this Request served on January 25, 2021 and supplements as follows: In addition to the Preliminary Statement and General Objections, which are incorporated herein by this reference, Brocade objects to this Request as vague, ambiguous, compound, and overbroad, particularly as to SNMP's definition of "Brocade," "Broadcom," "Extreme," "Relating to," and "SNMP Research Software," the vague terms "financial interest in the transfer," "disclosure," "or otherwise, and "was/is in the possession of Brocade," the request for "All Documents Relating to" without further specification, and the overbroad time period. Under SNMP's definitions incorporated into this Request, Brocade is defined to include, *inter alia*, all affiliated entities, including co-defendant Broadcom Inc. This Request is nonsensical because SNMP has defined Brocade to include Broadcom and vice versa, as well as all other affiliated entities and more. SNMP Research is similarly defined to include, *inter alia*, both Plaintiffs' predecessors, agents, representatives, divisions, and subsidiaries, which are unknown to Brocade. The definition of SNMP Research Software incorporates these overbroad entity definitions, and also includes software, Source Code and Derivative Works that are beyond the scope of this lawsuit. Conducting a search for documents of such broad scope under SNMP's defined and undefined terms would be unduly burdensome. The Request as framed seeks documents that are irrelevant and not proportional to the needs of the case. Brocade further objects to this Request as premature as it first requires review of information in SNMP's possession, including its software and/or source code. Brocade further objects to this Request as seeking premature expert discovery, analysis, and opinion. This Request also seeks a legal conclusion, assumes facts not yet proven by Plaintiffs, and is not tied to the claims or defenses in this case.

Brocade further objects to this Request as it requires the disclosure of confidential and proprietary information, documents, and tangible things of Brocade and third parties. Brocade further objects to this Requests to the extent the documents sought are not in Brocade's possession, custody, or control and are in the possession, custody, or control of third parties. Brocade further objects to this Request to the extent the documents sought are already in Plaintiffs' possession. Brocade further objects to this Request as this jurisdiction is an improper venue for this action.

Brocade objects to this Request to the extent it seeks disclosure of any information, documents, or other tangible things that is protected by any applicable privilege or protection, including without limitation the attorney-client privilege, the attorney work product doctrine, the joint client privilege, the joint defense or common interest privilege, the constitutional right to privacy, and the Federal Rules of Civil Procedure.

Subject to and without waiving the foregoing objections, Brocade responds as follows:

Brocade is willing to meet and confer with Plaintiff regarding this Request.

REQUEST FOR PRODUCTION NO. 57:

All Documents Relating to Broadcom Inc.'s involvement, direct or indirect, in the transfer (by disclosure, license, sale, or otherwise) of SNMP Research Software that was/is in the possession of Brocade to Extreme.

SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 57:

Brocade incorporates its original objections to this Request served on January 25, 2021 and supplements as follows: In addition to the Preliminary Statement and General Objections, which are incorporated herein by this reference, Brocade objects to this Request as vague, ambiguous, compound, and overbroad, particularly as to SNMP's definition of "Brocade," "Broadcom,"

“Extreme,” “Relating to,” and “SNMP Research Software,” the vague terms “Broadcom Inc.’s involvement,” “disclosure,” “in the transfer,” “or otherwise,” “was/is in the possession of,” and “direct or indirect,” the request for “All Documents Relating to” without further specification, and the overbroad time period. Under SNMP’s definitions incorporated into this Request, Brocade is defined to include, *inter alia*, all affiliated entities, including co-defendant Broadcom Inc. This Request is nonsensical because SNMP has defined Brocade to include Broadcom and vice versa, as well as all other affiliated entities and more. SNMP Research is similarly defined to include, *inter alia*, both Plaintiffs’ predecessors, agents, representatives, divisions, and subsidiaries, which are unknown to Brocade. The definition of SNMP Research Software incorporates these overbroad entity definitions, and also includes software, Source Code and Derivative Works that are beyond the scope of this lawsuit. Conducting a search for documents of such broad scope under SNMP’s defined and undefined terms would be unduly burdensome. The Request as framed seeks documents that are irrelevant and not proportional to the needs of the case. Brocade further objects to this Request as premature as it first requires review of information in SNMP’s possession, including its software and/or source code. Brocade further objects to this Request as seeking premature expert discovery, analysis, and opinion. This Request also seeks a legal conclusion, assumes facts not yet proven by Plaintiffs, and is not tied to the claims or defenses in this case.

Brocade further objects to this Request as it requires the disclosure of confidential and proprietary information, documents, and tangible things of Brocade and third parties. Brocade further objects to this Requests to the extent the documents sought are not in Brocade’s possession, custody, or control and are in the possession, custody, or control of third parties. Brocade further

objects to this Request to the extent the documents sought are already in Plaintiffs' possession. Brocade further objects to this Request as this jurisdiction is an improper venue for this action.

Brocade objects to this Request to the extent it seeks disclosure of any information, documents, or other tangible things that is protected by any applicable privilege or protection, including without limitation the attorney-client privilege, the attorney work product doctrine, the joint client privilege, the joint defense or common interest privilege, the constitutional right to privacy, and the Federal Rules of Civil Procedure.

Subject to and without waiving the foregoing objections, Brocade responds as follows:

Brocade is willing to meet and confer with Plaintiff regarding this Request.

REQUEST FOR PRODUCTION NO. 58:

All Documents Relating to any agreements between Brocade and Extreme from January 1, 2017 to present, including without limitation any agreements Relating to Extreme's acquisition and/or purchase of assets from Brocade.

SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 58:

Brocade incorporates its original objections to this Request served on January 25, 2021 and supplements as follows: In addition to the Preliminary Statement and General Objections, which are incorporated herein by this reference, Brocade objects to this Request as vague, ambiguous, compound, and overbroad, particularly as to SNMP's definition of "Brocade," "Extreme," and "Relating to," the vague term "acquisition and/or purchase of assets," the request for "All Documents Relating to" without further specification, and the overbroad time period. Under SNMP's definitions incorporated into this Request, Brocade is defined to include, *inter alia*, all affiliated entities, including co-defendant Broadcom Inc. Conducting a search for documents of

such broad scope under SNMP's defined and undefined terms would be unduly burdensome. The Request as framed seeks documents that are irrelevant and not proportional to the needs of the case. This Request also seeks a legal conclusion and is not tied to the claims or defenses in this case.

Brocade further objects to this Request as it requires the disclosure of confidential and proprietary information, documents, and tangible things of Brocade and third parties. Brocade further objects to this Requests to the extent the documents sought are not in Brocade's possession, custody, or control and are in the possession, custody, or control of third parties. Brocade further objects to this Request to the extent the documents sought are already in Plaintiffs' possession. Brocade further objects to this Request as this jurisdiction is an improper venue for this action.

Brocade objects to this Request to the extent it seeks disclosure of any information, documents, or other tangible things that is protected by any applicable privilege or protection, including without limitation the attorney-client privilege, the attorney work product doctrine, the joint client privilege, the joint defense or common interest privilege, the constitutional right to privacy, and the Federal Rules of Civil Procedure.

Subject to and without waiving the foregoing objections, Brocade responds as follows:

Brocade is willing to meet and confer with Plaintiff regarding this Request.

REQUEST FOR PRODUCTION NO. 59:

All Documents Relating to the March 29, 2017 "Purchase Agreement" with Extreme.

SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 59:

Brocade incorporates its original objections to this Request served on January 25, 2021 and supplements as follows: In addition to the Preliminary Statement and General Objections, which

are incorporated herein by this reference, Brocade objects to this Request as vague, ambiguous, compound, and overbroad, particularly as to SNMP's definition of "Relating to" and "Extreme," the vague term "Purchase Agreement," and the categories required to be identified. Conducting a search for documents of such broad scope under SNMP's defined and undefined terms would be unduly burdensome. The Request as framed seeks documents that are irrelevant and not proportional to the needs of the case.

Brocade further objects to this Request as it requires the disclosure of confidential and proprietary information, documents, and tangible things of Brocade and third parties. Brocade further objects to this Requests to the extent the documents sought are not in Brocade's possession, custody, or control and are in the possession, custody, or control of third parties. Brocade further objects to this Request to the extent the documents sought are already in Plaintiffs' possession. Brocade further objects to this Request as this jurisdiction is an improper venue for this action.

Brocade objects to this Request to the extent it seeks disclosure of any information, documents, or other tangible things that is protected by any applicable privilege or protection, including without limitation the attorney-client privilege, the attorney work product doctrine, the joint client privilege, the joint defense or common interest privilege, the constitutional right to privacy, and the Federal Rules of Civil Procedure.

Subject to and without waiving these objections, Brocade responds as follows:

Brocade will produce, on a rolling basis, non-privileged documents, to the extent that such documents exist, are within Brocade's possession, custody, or control, have not already been produced, and are located after a reasonably diligent search, that constitute the March 29, 2017 "Purchase Agreement."

REQUEST FOR PRODUCTION NO. 60:

All Documents Relating to the October 3, 2017 “Consent Agreement” with Extreme.

SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 60:

Brocade incorporates its original objections to this Request served on January 25, 2021 and supplements as follows: In addition to the Preliminary Statement and General Objections, which are incorporated herein by this reference, Brocade objects to this Request as vague, ambiguous, compound, and overbroad, particularly as to SNMP’s definition of “Relating to” and “Extreme,” the vague and undefined term “Consent Agreement,” the vague and overbroad request for “all Documents Relating to” this undefined agreement without further specification, and the overbroad time period. Conducting a search for documents of such broad scope under SNMP’s defined and undefined terms would be unduly burdensome. The Request as framed seeks documents that are irrelevant and not proportional to the needs of the case. This Request seeks a legal conclusion, is not tied to the claims or defenses in this case and it does not specify the counterparty to the Consent Agreement.

Brocade further objects to this Request as it requires the disclosure of confidential and proprietary information, documents, and tangible things of Brocade and third parties. Brocade further objects to this Requests to the extent the documents sought are not in Brocade’s possession, custody, or control and are in the possession, custody, or control of third parties. Brocade further objects to this Request to the extent the documents sought are already in Plaintiffs’ possession. Brocade further objects to this Request as this jurisdiction is an improper venue for this action.

Brocade objects to this Request to the extent it seeks disclosure of any information, documents, or other tangible things that is protected by any applicable privilege or protection, including without limitation the attorney-client privilege, the attorney work product doctrine, the

joint client privilege, the joint defense or common interest privilege, the constitutional right to privacy, and the Federal Rules of Civil Procedure.

Subject to and without waiving these objections, Brocade responds as follows:

Brocade will produce, on a rolling basis, non-privileged documents, to the extent that such documents exist, are within Brocade's possession, custody, or control, have not already been produced, and are located after a reasonably diligent search, that constitute the October 3, 2017 "Consent Agreement."

REQUEST FOR PRODUCTION NO. 61:

All Documents constituting the October 3, 2017 "Consent Agreement" with Extreme, including any amendments to it.

SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 61:

Brocade incorporates its original objections to this Request served on January 25, 2021 and supplements as follows: In addition to the Preliminary Statement and General Objections, which are incorporated herein by this reference, Brocade objects to this Request as vague, ambiguous, duplicative, compound, and overbroad, particularly as to SNMP's definition of "Extreme," the vague and undefined terms "constituting" and "Consent Agreement" and "any amendments to it," and the vague and overbroad request for "all Documents constituting" this undefined agreement without further specification. Conducting a search for documents of such broad scope under SNMP's defined and undefined terms would be unduly burdensome. The Request as framed seeks documents that are irrelevant and not proportional to the needs of the case. This Request seeks a legal conclusion and is not tied to the claims or defenses in this case and it does not specify the counterparty to the Consent Agreement.

Brocade further objects to this Request as it requires the disclosure of confidential and proprietary information, documents, and tangible things of Brocade and third parties. Brocade further objects to this Requests to the extent the documents sought are not in Brocade's possession, custody, or control and are in the possession, custody, or control of third parties. Brocade further objects to this Request to the extent the documents sought are already in Plaintiffs' possession. Brocade further objects to this Request as this jurisdiction is an improper venue for this action.

Brocade objects to this Request to the extent it seeks disclosure of any information, documents, or other tangible things that is protected by any applicable privilege or protection, including without limitation the attorney-client privilege, the attorney work product doctrine, the joint client privilege, the joint defense or common interest privilege, the constitutional right to privacy, and the Federal Rules of Civil Procedure.

Subject to and without waiving these objections, Brocade responds as follows:

Brocade will produce, on a rolling basis, non-privileged documents, to the extent that such documents exist, are within Brocade's possession, custody, or control, have not already been produced, and are located after a reasonably diligent search, that constitute the October 3, 2017 "Consent Agreement" and amendments thereto.

REQUEST FOR PRODUCTION NO. 62:

All Documents Relating to the "Separate Sale Agreement" between Extreme and Brocade, as referenced in the October 3, 2017 "Consent Agreement."

SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 62:

Brocade incorporates its original objections to this Request served on January 25, 2021 and supplements as follows: In addition to the Preliminary Statement and General Objections, which

are incorporated herein by this reference, Brocade objects to this Request as vague, ambiguous, compound, and overbroad, particularly as to SNMP's definition of "Brocade," "Extreme," and "Relating to," the vague and undefined terms "Separate Sale Agreement" and "Consent Agreement," the vague and overbroad request for "All Documents Relating to" without further specification, and the overbroad time period. Under SNMP's definitions incorporated into this Request, Brocade is defined to include, *inter alia*, all affiliated entities, including co-defendant Broadcom Inc. Conducting a search for documents of such broad scope under SNMP's defined and undefined terms would be unduly burdensome. The Request as framed seeks documents that are irrelevant and not proportional to the needs of the case. This Request seeks a legal conclusion and is not tied to the claims or defenses in this case and it does not specify the counterparty to the Consent Agreement or Separate Sale Agreement.

Brocade further objects to this Request as it requires the disclosure of confidential and proprietary information, documents, and tangible things of Brocade and third parties. Brocade further objects to this Requests to the extent the documents sought are not in Brocade's possession, custody, or control and are in the possession, custody, or control of third parties. Brocade further objects to this Request to the extent the documents sought are already in Plaintiffs' possession. Brocade further objects to this Request as this jurisdiction is an improper venue for this action.

Brocade objects to this Request to the extent it seeks disclosure of any information, documents, or other tangible things that is protected by any applicable privilege or protection, including without limitation the attorney-client privilege, the attorney work product doctrine, the joint client privilege, the joint defense or common interest privilege, the constitutional right to privacy, and the Federal Rules of Civil Procedure.

Subject to and without waiving these objections, Brocade responds as follows:

Brocade will produce, on a rolling basis, non-privileged documents, to the extent that such documents exist, are within Brocade's possession, custody, or control, have not already been produced, and are located after a reasonably diligent search, that constitute the "Separate Sale Agreement" with Brocade (as referenced in the October 3, 2017 "Consent Agreement") and amendments thereto.

REQUEST FOR PRODUCTION NO. 63:

All Documents constituting the "Separate Sale Agreement" between Extreme and Brocade (as referenced in the October 3, 2017 "Consent Agreement"), including any amendments to it.

SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 63:

Brocade incorporates its original objections to this Request served on January 25, 2021 and supplements as follows: In addition to the Preliminary Statement and General Objections, which are incorporated herein by this reference, Brocade objects to this Request as vague, ambiguous, compound, and overbroad, particularly as to SNMP's definition of "Brocade" and "Extreme," the vague and undefined terms "Separate Sale Agreement," "constituting," and "Consent Agreement," the vague and overbroad request for "All Documents constituting" without further specification, and the overbroad time period. Under SNMP's definitions incorporated into this Request, Brocade is defined to include, *inter alia*, all affiliated entities, including co-defendant Broadcom Inc. Conducting a search for documents of such broad scope under SNMP's defined and undefined terms would be unduly burdensome. The Request as framed seeks documents that are irrelevant and not proportional to the needs of the case. This Request seeks a legal conclusion and is not tied to the claims or defenses in this case and it does not specify the counterparty to the Consent Agreement or Separate Sale Agreement.

Brocade further objects to this Request as it requires the disclosure of confidential and proprietary information, documents, and tangible things of Brocade and third parties. Brocade further objects to this Requests to the extent the documents sought are not in Brocade's possession, custody, or control and are in the possession, custody, or control of third parties. Brocade further objects to this Request to the extent the documents sought are already in Plaintiffs' possession. Brocade further objects to this Request as this jurisdiction is an improper venue for this action.

Brocade objects to this Request to the extent it seeks disclosure of any information, documents, or other tangible things that is protected by any applicable privilege or protection, including without limitation the attorney-client privilege, the attorney work product doctrine, the joint client privilege, the joint defense or common interest privilege, the constitutional right to privacy, and the Federal Rules of Civil Procedure.

Subject to and without waiving these objections, Brocade responds as follows:

Brocade will produce, on a rolling basis, non-privileged documents, to the extent that such documents exist, are within Brocade's possession, custody, or control, have not already been produced, and are located after a reasonably diligent search, that constitute the "Separate Sale Agreement" with Brocade (as referenced in the October 3, 2017 "Consent Agreement") and amendments thereto.

REQUEST FOR PRODUCTION NO. 64:

All Documents Relating to the "Release" Identified in the October 3, 2017 "Consent Agreement."

SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 64:

Brocade incorporates its original objections to this Request served on January 25, 2021 and supplements as follows: In addition to the Preliminary Statement and General Objections, which are incorporated herein by this reference, Brocade objects to this Request as vague, ambiguous, compound, and overbroad, particularly as to SNMP's definition of "Identified" and "Relating to," the vague and undefined terms "Release" and "Consent Agreement," and the vague and overbroad request for "All Documents Relating to" without further specification, and the overbroad time period. Conducting a search for documents of such broad scope under SNMP's defined and undefined terms would be unduly burdensome. The Request as framed seeks documents that are irrelevant and not proportional to the needs of the case. This Request seeks a legal conclusion and is not tied to the claims or defenses in this case and it does not specify the counterparty to the Consent Agreement or Release.

Brocade further objects to this Request as it requires the disclosure of confidential and proprietary information, documents, and tangible things of Brocade and third parties. Brocade further objects to this Requests to the extent the documents sought are not in Brocade's possession, custody, or control and are in the possession, custody, or control of third parties. Brocade further objects to this Request to the extent the documents sought are already in Plaintiffs' possession. Brocade further objects to this Request as this jurisdiction is an improper venue for this action.

Brocade objects to this Request to the extent it seeks disclosure of any information, documents, or other tangible things that is protected by any applicable privilege or protection, including without limitation the attorney-client privilege, the attorney work product doctrine, the joint client privilege, the joint defense or common interest privilege, the constitutional right to privacy, and the Federal Rules of Civil Procedure.

Subject to and without waiving these objections, Brocade responds as follows:

Brocade will produce, on a rolling basis, non-privileged documents, to the extent that such documents exist, are within Brocade's possession, custody, or control, have not already been produced, and are located after a reasonably diligent search, that constitute the "Release" identified in the October 3, 2017 "Consent Agreement" and amendments thereto.

REQUEST FOR PRODUCTION NO. 65:

All Documents constituting the "Release" Identified in the October 3, 2017 "Consent Agreement," including any amendments to it.

SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 65:

Brocade incorporates its original objections to this Request served on January 25, 2021 and supplements as follows: In addition to the Preliminary Statement and General Objections, which are incorporated herein by this reference, Brocade objects to this Request as vague, ambiguous, duplicative, compound, and overbroad, particularly as to SNMP's definition of "Identified," the vague and undefined terms "constituting," "Release," and "Consent Agreement," the vague and overbroad request for "All Documents constituting" without further specification, and the overbroad time period. Conducting a search for documents of such broad scope under SNMP's defined and undefined terms would be unduly burdensome. The Request as framed seeks documents that are irrelevant and not proportional to the needs of the case. This Request seeks a legal conclusion and is not tied to the claims or defenses in this case and it does not specify the counterparty to the Consent Agreement or Release.

Brocade further objects to this Request as it requires the disclosure of confidential and proprietary information, documents, and tangible things of Brocade and third parties. Brocade

further objects to this Requests to the extent the documents sought are not in Brocade's possession, custody, or control and are in the possession, custody, or control of third parties. Brocade further objects to this Request to the extent the documents sought are already in Plaintiffs' possession. Brocade further objects to this Request as this jurisdiction is an improper venue for this action.

Brocade objects to this Request to the extent it seeks disclosure of any information, documents, or other tangible things that is protected by any applicable privilege or protection, including without limitation the attorney-client privilege, the attorney work product doctrine, the joint client privilege, the joint defense or common interest privilege, the constitutional right to privacy, and the Federal Rules of Civil Procedure.

Subject to and without waiving these objections, Brocade responds as follows:

Brocade will produce, on a rolling basis, non-privileged documents, to the extent that such documents exist, are within Brocade's possession, custody, or control, have not already been produced, and are located after a reasonably diligent search, that constitute the "Release" identified in the October 3, 2017 "Consent Agreement" and amendments thereto.

REQUEST FOR PRODUCTION NO. 66:

All Documents Relating to the "Consent Payment" Identified in the October 3, 2017 "Consent Agreement."

SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 66:

Brocade incorporates its original objections to this Request served on January 25, 2021 and supplements as follows: In addition to the Preliminary Statement and General Objections, which are incorporated herein by this reference, Brocade objects to this Request as vague, ambiguous, duplicative, compound, and overbroad, particularly as to SNMP's definition of "Relating to" and

“Identified,” the vague and undefined terms “Consent Payment” and “Consent Agreement,” the vague and overbroad request for “All Documents Relating to” without further specification, and the overbroad time period. Conducting a search for documents of such broad scope under SNMP’s defined and undefined terms would be unduly burdensome. The Request as framed seeks documents that are irrelevant and not proportional to the needs of the case. This Request seeks a legal conclusion and is not tied to the claims or defenses in this case and it does not specify the parties to the Consent Agreement or Consent Payment.

Brocade further objects to this Request as it requires the disclosure of confidential and proprietary information, documents, and tangible things of Brocade and third parties. Brocade further objects to this Requests to the extent the documents sought are not in Brocade’s possession, custody, or control and are in the possession, custody, or control of third parties. Brocade further objects to this Request to the extent the documents sought are already in Plaintiffs’ possession. Brocade further objects to this Request as this jurisdiction is an improper venue for this action.

Brocade objects to this Request to the extent it seeks disclosure of any information, documents, or other tangible things that is protected by any applicable privilege or protection, including without limitation the attorney-client privilege, the attorney work product doctrine, the joint client privilege, the joint defense or common interest privilege, the constitutional right to privacy, and the Federal Rules of Civil Procedure.

Subject to and without waiving these objections, Brocade responds as follows:

Brocade is willing to meet and confer regarding this Request.

REQUEST FOR PRODUCTION NO. 67:

All Documents constituting the “Consent Payment” Identified in the October 3, 2017 “Consent Agreement,” including any amendments to it.

SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 67:

Brocade incorporates its original objections to this Request served on January 25, 2021 and supplements as follows: In addition to the Preliminary Statement and General Objections, which are incorporated herein by this reference, Brocade objects to this Request as vague, ambiguous, duplicative, compound, and overbroad, particularly as to SNMP’s definition of “Identified,” the vague and undefined terms “constituting,” “Consent Payment,” and “Consent Agreement,” and “any amendments,” the vague and overbroad request for “All Documents constituting” without further specification, and the overbroad time period. Conducting a search for documents of such broad scope under SNMP’s defined and undefined terms would be unduly burdensome. The Request as framed seeks documents that are irrelevant and not proportional to the needs of the case. This Request seeks a legal conclusion and is not tied to the claims or defenses in this case and it does not specify the parties to the Consent Agreement or Consent Payment.

Brocade further objects to this Request as it requires the disclosure of confidential and proprietary information, documents, and tangible things of Brocade and third parties. Brocade further objects to this Requests to the extent the documents sought are not in Brocade’s possession, custody, or control and are in the possession, custody, or control of third parties. Brocade further objects to this Request to the extent the documents sought are already in Plaintiffs’ possession. Brocade further objects to this Request as this jurisdiction is an improper venue for this action.

Brocade objects to this Request to the extent it seeks disclosure of any information, documents, or other tangible things that is protected by any applicable privilege or protection,

including without limitation the attorney-client privilege, the attorney work product doctrine, the joint client privilege, the joint defense or common interest privilege, the constitutional right to privacy, and the Federal Rules of Civil Procedure.

Subject to and without waiving these objections, Brocade responds as follows:

Brocade is willing to meet and confer regarding this Request.

REQUEST FOR PRODUCTION NO. 68:

All Documents from January 1, 2017 to present Relating to Extreme's acquisition and/or purchase of assets from Brocade as contemplated in the Extreme Sale.

SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 68:

Brocade incorporates its original objections to this Request served on January 25, 2021 and supplements as follows: In addition to the Preliminary Statement and General Objections, which are incorporated herein by this reference, Brocade objects to this Request as vague, ambiguous, compound, and overbroad, particularly as to SNMP's definition of "Brocade," "Extreme," and "Relating to," the vague terms "as contemplated in" and "Extreme Sale" and "acquisition and/or purchase of assets," the overbroad request for all Documents Relating to without further specification, and the overbroad time period. Under SNMP's definitions incorporated into this Request, Brocade is defined to include, *inter alia*, all affiliated entities, including co-defendant Broadcom Inc. Conducting a search for documents of such broad scope under SNMP's defined and undefined terms would be unduly burdensome. The Request as framed seeks documents that are irrelevant and not proportional to the needs of the case. This Request seeks a legal conclusion, assumes facts not yet proven by Plaintiffs, and is not tied to the claims or defenses in this case.

Brocade further objects to this Request as it requires the disclosure of confidential and proprietary information, documents, and tangible things of Brocade and third parties. Brocade further objects to this Requests to the extent the documents sought are not in Brocade's possession, custody, or control and are in the possession, custody, or control of third parties. Brocade further objects to this Request to the extent the documents sought are already in Plaintiffs' possession. Brocade further objects to this Request as this jurisdiction is an improper venue for this action.

Brocade objects to this Request to the extent it seeks disclosure of any information, documents, or other tangible things that is protected by any applicable privilege or protection, including without limitation the attorney-client privilege, the attorney work product doctrine, the joint client privilege, the joint defense or common interest privilege, the constitutional right to privacy, and the Federal Rules of Civil Procedure.

Subject to and without waiving the foregoing objections, Brocade will produce, on a rolling basis, non-privileged documents, to the extent that such documents exist, are within Brocade's possession, custody, or control, have not already been produced, and are located after a reasonably diligent search, constituting agreements between Brocade or Broadcom regarding the acquisition of Brocade's data center switching, routing, and analytics business.

REQUEST FOR PRODUCTION NO. 69:

All Documents Relating to Broadcom Inc.'s sharing, either directly or indirectly, in the revenues, profits, and/or losses from Brocades' development, production, servicing, sale, and/or distribution of the Products Identified in response to Interrogatory numbers 1 and 2.

SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 69:

Brocade incorporates its original objections to this Request served on January 25, 2021 and supplements as follows: In addition to the Preliminary Statement, General Objections, and the objections to Interrogatory numbers 1 and 2, which are incorporated herein by this reference, Brocade objects to this Request as unintelligible, vague, ambiguous, duplicative, compound, and overbroad, particularly as to SNMP's definition of "Brocade," "Broadcom," "Relating to," "Products," and "Identified," the vague terms "directly or indirectly," "sharing," "profits and/or losses," and "development, production, servicing, sale, and/or distribution," the overbroad request for "All Documents Relating to" without further specification, the overbroad time period, and the categories required to be identified by the Interrogatories. Under SNMP's definitions, Brocade is defined to include, *inter alia*, all affiliated entities, including co-defendant Broadcom Inc. This Request is nonsensical because SNMP has defined Brocade to include Broadcom and vice versa, as well as all other affiliated entities and more. SNMP Research is similarly defined to include, *inter alia*, both Plaintiffs' predecessors, agents, representatives, divisions, and subsidiaries, which are unknown to Brocade. The definition of SNMP Research Software incorporates these overbroad entity definitions, and also includes software, Source Code and Derivative Works that are beyond the scope of this lawsuit. Conducting a search for documents of such broad scope under SNMP's defined and undefined terms would be unduly burdensome. The Request as framed seeks documents that are irrelevant and not proportional to the needs of the case. Brocade further objects to this Request as premature as it first requires review of information in SNMP's possession, including its software and/or source code. Brocade further objects to this Request as seeking premature expert discovery, analysis, and opinion. This Request seeks a legal conclusion and assumes facts not yet proven by Plaintiffs. Moreover, no Products were Identified.

Brocade further objects to this Request as it requires the disclosure of confidential and proprietary information, documents, and tangible things of Brocade and third parties. Brocade further objects to this Requests to the extent the documents sought are not in Brocade's possession, custody, or control and are in the possession, custody, or control of third parties. Brocade further objects to this Request to the extent the documents sought are already in Plaintiffs' possession. Brocade further objects to this Request as this jurisdiction is an improper venue for this action.

Brocade objects to this Request to the extent it seeks disclosure of any information, documents, or other tangible things that is protected by any applicable privilege or protection, including without limitation the attorney-client privilege, the attorney work product doctrine, the joint client privilege, the joint defense or common interest privilege, the constitutional right to privacy, and the Federal Rules of Civil Procedure.

Subject to and without waiving the foregoing objections, Brocade responds as follows:

Brocade is willing to meet and confer regarding this Request.

REQUEST FOR PRODUCTION NO. 70:

ll[sic] Documents Relating to Broadcom Inc.'s financial interest in Brocade's sale, development, production, servicing, distribution, and/or creation of the Products Identified in response to Interrogatory numbers 1 and 2.

SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 70:

Brocade incorporates its original objections to this Request served on January 25, 2021 and supplements as follows: In addition to the Preliminary Statement, General Objections, and objections to Interrogatory numbers 1 and 2, which are incorporated herein by this reference, Brocade objects to this Request as unintelligible, vague, ambiguous, compound, and overbroad,

particularly as to SNMP's definition of "Brocade," "Broadcom," "Relating to," "Products," and "Identified," the vague terms "financial interest" and "development, production, servicing, distribution and/or creation," the overbroad request for "All Documents Relating to" without further specification, the overbroad time period, and the categories required to be identified by these Interrogatories. Under SNMP's definitions, Brocade is defined to include, *inter alia*, all affiliated entities, including co-defendant Broadcom Inc. This Request is nonsensical because SNMP has defined Brocade to include Broadcom and vice versa, as well as all other affiliated entities and more. SNMP Research is similarly defined to include, *inter alia*, both Plaintiffs' predecessors, agents, representatives, divisions, and subsidiaries, which are unknown to Brocade. The definition of SNMP Research Software incorporates these overbroad entity definitions, and also includes software, Source Code and Derivative Works that are beyond the scope of this lawsuit. Conducting a search for documents of such broad scope under SNMP's defined and undefined terms would be unduly burdensome. The Request as framed seeks documents that are irrelevant and not proportional to the needs of the case. Brocade further objects to this Request as premature as it first requires review of information in SNMP's possession, including its software and/or source code. Brocade further objects to this Request as seeking premature expert discovery, analysis, and opinion. This Request seeks a legal conclusion and assumes facts not yet proven by Plaintiffs. Moreover, no Products were Identified.

Brocade further objects to this Request as it requires the disclosure of confidential and proprietary information, documents, and tangible things of Brocade and third parties. Brocade further objects to this Requests to the extent the documents sought are not in Brocade's possession, custody, or control and are in the possession, custody, or control of third parties. Brocade further

objects to this Request to the extent the documents sought are already in Plaintiffs' possession. Brocade further objects to this Request as this jurisdiction is an improper venue for this action.

Brocade objects to this Request to the extent it seeks disclosure of any information, documents, or other tangible things that is protected by any applicable privilege or protection, including without limitation the attorney-client privilege, the attorney work product doctrine, the joint client privilege, the joint defense or common interest privilege, the constitutional right to privacy, and the Federal Rules of Civil Procedure.

Subject to and without waiving the foregoing objections, Brocade responds as follows:

Brocade is willing to meet and confer regarding this Request.

REQUEST FOR PRODUCTION NO. 71:

All Documents Relating to Broadcom Inc.'s involvement, direct or indirect, in Brocade's development, production, servicing, sale, and/or distribution of the Products Identified in response to Interrogatory numbers 1 and 2.

SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 71:

Brocade incorporates its original objections to this Request served on January 25, 2021 and supplements as follows: In addition to the Preliminary Statement, General Objections, the objections to Interrogatory numbers 1 and 2, which are incorporated herein by this reference, Brocade objects to this Request as unintelligible, vague, ambiguous, compound, and overbroad, particularly as to SNMP's definition of "Brocade," "Broadcom," "Relating to," "Products," and "Identified," the vague terms "direct or indirect," "involvement," and "development, production, servicing, sale, and/or distribution," the overbroad request for "All Documents Relating to" without further specification, the overbroad time period, and the categories required to be

identified by these Interrogatories. Under SNMP's definitions incorporated into this Request by Interrogatories numbers 1 and 2, Brocade is defined to include, *inter alia*, all affiliated entities, including co-defendant Broadcom Inc. This Request is nonsensical because SNMP has defined Brocade to include Broadcom and vice versa, as well as all other affiliated entities and more. SNMP Research is similarly defined to include, *inter alia*, both Plaintiffs' predecessors, agents, representatives, divisions, and subsidiaries, which are unknown to Brocade. The definition of SNMP Research Software incorporates these overbroad entity definitions, and also includes software, Source Code and Derivative Works that are beyond the scope of this lawsuit. Conducting a search for documents of such broad scope under SNMP's defined and undefined terms would be unduly burdensome. The Request as framed seeks documents that are irrelevant and not proportional to the needs of the case. Brocade further objects to this Request as premature as it first requires review of information in SNMP's possession, including its software and/or source code. Brocade further objects to this Request as seeking premature expert discovery, analysis, and opinion. This Request seeks a legal conclusion and assumes facts not yet proven by Plaintiffs. Moreover, no Products were Identified.

Brocade further objects to this Request as it requires the disclosure of confidential and proprietary information, documents, and tangible things of Brocade and third parties. Brocade further objects to this Requests to the extent the documents sought are not in Brocade's possession, custody, or control and are in the possession, custody, or control of third parties. Brocade further objects to this Request to the extent the documents sought are already in Plaintiffs' possession. Brocade further objects to this Request as this jurisdiction is an improper venue for this action.

Brocade objects to this Request to the extent it seeks disclosure of any information, documents, or other tangible things that is protected by any applicable privilege or protection,

including without limitation the attorney-client privilege, the attorney work product doctrine, the joint client privilege, the joint defense or common interest privilege, the constitutional right to privacy, and the Federal Rules of Civil Procedure.

Subject to and without waiving the foregoing objections, Brocade responds as follows:

Brocade is willing to meet and confer regarding this Request.

REQUEST FOR PRODUCTION NO. 72:

All Documents Relating to Broadcom Inc.’s involvement, direct or indirect, with Brocade’s development, production, servicing, sale, and/or distribution of Derivative Works with respect to SNMP Research Software.

SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 72:

Brocade incorporates its original objections to this Request served on January 25, 2021 and supplements as follows: In addition to the Preliminary Statement and General Objections, which are incorporated herein by this reference, Brocade objects to this Request as vague, ambiguous, compound, and overbroad, particularly as to SNMP’s definition of “Brocade,” “Broadcom,” “Relating to,” “Derivative Works,” and “SNMP Research Software,” the vague terms “direct or indirect,” “involvement,” “development, production, servicing, sale, and/or distribution,” the overbroad request for “All Documents Relating to” without further specification, and the overbroad time period. Under SNMP’s definitions incorporated into this Request, Brocade is defined to include, *inter alia*, all affiliated entities, including co-defendant Broadcom Inc. This Request is nonsensical because SNMP has defined Brocade to include Broadcom and vice versa, as well as all other affiliated entities and more. SNMP Research is similarly defined to include, *inter alia*, both Plaintiffs’ predecessors, agents, representatives, divisions, and subsidiaries, which

are unknown to Brocade. The definition of SNMP Research Software incorporates these overbroad entity definitions, and also includes software, Source Code and Derivative Works that are beyond the scope of this lawsuit. Conducting a search for documents of such broad scope under SNMP's defined and undefined terms would be unduly burdensome. The Request as framed seeks documents that are irrelevant and not proportional to the needs of the case. Brocade further objects to this Request as premature as it first requires review of information in SNMP's possession, including its software and/or source code. Brocade further objects to this Request as seeking premature expert discovery, analysis, and opinion. This Request seeks a legal conclusion and assumes facts not yet proven by Plaintiffs.

Brocade further objects to this Request as it requires the disclosure of confidential and proprietary information, documents, and tangible things of Brocade and third parties. Brocade further objects to this Requests to the extent the documents sought are not in Brocade's possession, custody, or control and are in the possession, custody, or control of third parties. Brocade further objects to this Request to the extent the documents sought are already in Plaintiffs' possession. Brocade further objects to this Request as this jurisdiction is an improper venue for this action.

Brocade objects to this Request to the extent it seeks disclosure of any information, documents, or other tangible things that is protected by any applicable privilege or protection, including without limitation the attorney-client privilege, the attorney work product doctrine, the joint client privilege, the joint defense or common interest privilege, the constitutional right to privacy, and the Federal Rules of Civil Procedure.

Subject to and without waiving the foregoing objections, Brocade responds as follows:

Brocade is willing to meet and confer regarding this Request.

REQUEST FOR PRODUCTION NO. 73:

All Communications with Broadcom Inc. Relating to the License Agreement.

SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 73:

Brocade incorporates its original objections to this Request served on January 25, 2021 and supplements as follows: In addition to the Preliminary Statement and General Objections, which are incorporated herein by this reference, Brocade objects to this Request as vague, ambiguous, compound, and overbroad, particularly as to SNMP's definition of "Broadcom" and "Relating to," the overbroad request for All Communications Relating to without further specification, and the overbroad time period. Under SNMP's definitions incorporated into this Request, Brocade is defined to include, *inter alia*, all affiliated entities, including co-defendant Broadcom Inc. This Request is nonsensical because SNMP has defined Brocade to include Broadcom and vice versa, as well as all other affiliated entities and more. Conducting a search for documents of such broad scope under SNMP's defined and undefined terms would be unduly burdensome and then listing all Communications would be unduly burdensome. The Request as framed seeks documents that are irrelevant and not proportional to the needs of the case. Brocade further objects to this Request as premature as it first requires review of information in SNMP's possession, including its software and/or source code. Brocade further objects to this Request as seeking premature expert discovery, analysis, and opinion.

Brocade further objects to this Request as it requires the disclosure of confidential and proprietary information, documents, and tangible things of Brocade and third parties. Brocade further objects to this Requests to the extent the documents sought are not in Brocade's possession, custody, or control and are in the possession, custody, or control of third parties. Brocade further

objects to this Request to the extent the documents sought are already in Plaintiffs' possession. Brocade further objects to this Request as this jurisdiction is an improper venue for this action.

Brocade objects to this Request to the extent it seeks disclosure of any information, documents, or other tangible things that is protected by any applicable privilege or protection, including without limitation the attorney-client privilege, the attorney work product doctrine, the joint client privilege, the joint defense or common interest privilege, the constitutional right to privacy, and the Federal Rules of Civil Procedure.

Subject to and without waiving the foregoing objections, Brocade responds as follows:

Brocade is willing to meet and confer regarding this Request.

REQUEST FOR PRODUCTION NO. 74:

All Documents Relating to Broadcom Inc.'s efforts, either directly or indirectly, to develop, produce, sell, service, distribute, advertise, and/or market nationwide any Products Identified in response to Interrogatory number 1.

SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 74:

Brocade incorporates its original objections to this Request served on January 25, 2021 and supplements as follows: In addition to the Preliminary Statement, General Objections, the objections to Interrogatory number 1, which are incorporated herein by this reference, Brocade objects to this Request as vague, ambiguous, compound, and overbroad, particularly as to SNMP's definition of "Broadcom," "Relating to," Products," and "Identified," the vague terms "directly or indirectly," the overbroad request for "All Documents Relating to" without further specification, the overbroad time period, and the categories required to be identified by these Interrogatories. Under SNMP's definitions incorporated into this Request by reference to Interrogatory number 1,

Brocade is defined to include, *inter alia*, all affiliated entities, including co-defendant Broadcom Inc. SNMP Research is similarly defined to include, *inter alia*, both Plaintiffs' predecessors, agents, representatives, divisions, and subsidiaries, which are unknown to Brocade. The definition of SNMP Research Software incorporates these overbroad entity definitions, and also includes software, Source Code and Derivative Works that are beyond the scope of this lawsuit. Conducting a search for documents of such broad scope under SNMP's defined and undefined terms would be unduly burdensome. The Request as framed seeks documents that are irrelevant and not proportional to the needs of the case. Brocade further objects to this Request as premature as it first requires review of information in SNMP's possession, including its software and/or source code. Brocade further objects to this Request as seeking premature expert discovery, analysis, and opinion. This Request seeks a legal conclusion and assumes facts not yet proven by Plaintiffs. Moreover, no Products were Identified.

Brocade further objects to this Request as it requires the disclosure of confidential and proprietary information, documents, and tangible things of Brocade and third parties. Brocade further objects to this Requests to the extent the documents sought are not in Brocade's possession, custody, or control and are in the possession, custody, or control of third parties. Brocade further objects to this Request to the extent the documents sought are already in Plaintiffs' possession. Brocade further objects to this Request as this jurisdiction is an improper venue for this action. The Court has yet to (1) conclude that Plaintiffs have adequately made a *prima facie* showing of personal jurisdiction over Broadcom; or (2) order that Plaintiffs are entitled to jurisdictional discovery.

Brocade objects to this Request to the extent it seeks disclosure of any information, documents, or other tangible things that is protected by any applicable privilege or protection,

including without limitation the attorney-client privilege, the attorney work product doctrine, the joint client privilege, the joint defense or common interest privilege, the constitutional right to privacy, and the Federal Rules of Civil Procedure.

Subject to and without waiving the foregoing objections, Brocade responds as follows:

Brocade is willing to meet and confer regarding this Request.

REQUEST FOR PRODUCTION NO. 75:

All Documents Relating to Broadcom Inc.’s efforts, either directly or indirectly, to develop, produce, sell, service, distribute, advertise, and/or market in Tennessee any Products Identified in response to Interrogatory number 1.

SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 75:

Brocade incorporates its original objections to this Request served on January 25, 2021 and supplements as follows: In addition to the Preliminary Statement, General Objections, the objections to Interrogatory number 1, which are incorporated herein by this reference, Brocade objects to this Request as vague, ambiguous, compound, and overbroad, particularly as to SNMP’s definition of “Broadcom,” “Relating to,” Products,” and “Identified,” the vague terms “directly or indirectly” and “efforts” and “develop, produce, sell, service, distribute, advertise, and/or market,” the overbroad request for “All Documents Relating to” without further specification, the overbroad time period, and the categories required to be identified by this Interrogatory. Under SNMP’s definitions incorporated into this Request by reference to Interrogatory number 1, Brocade is defined to include, *inter alia*, all affiliated entities, including co-defendant Broadcom Inc. SNMP Research is similarly defined to include, *inter alia*, both Plaintiffs’ predecessors, agents, representatives, divisions, and subsidiaries, which are unknown to Brocade. The definition of

SNMP Research Software incorporates these overbroad entity definitions, and also includes software, Source Code and Derivative Works that are beyond the scope of this lawsuit. Conducting a search for documents of such broad scope under SNMP's defined and undefined terms would be unduly burdensome. The Request as framed seeks documents that are irrelevant and not proportional to the needs of the case. Brocade further objects to this Request as premature as it first requires review of information in SNMP's possession, including its software and/or source code. Brocade further objects to this Request as seeking premature expert discovery, analysis, and opinion. This Request seeks a legal conclusion and assumes facts not yet proven by Plaintiffs. Moreover no Products were Identified.

Brocade further objects to this Request as it requires the disclosure of confidential and proprietary information, documents, and tangible things of Brocade and third parties. Brocade further objects to this Requests to the extent the documents sought are not in Brocade's possession, custody, or control and are in the possession, custody, or control of third parties. Brocade further objects to this Request to the extent the documents sought are already in Plaintiffs' possession. Brocade further objects to this Request as this jurisdiction is an improper venue for this action. The Court has yet to (1) conclude that Plaintiffs have adequately made a *prima facie* showing of personal jurisdiction over Broadcom; or (2) order that Plaintiffs are entitled to jurisdictional discovery.

Brocade objects to this Request to the extent it seeks disclosure of any information, documents, or other tangible things that is protected by any applicable privilege or protection, including without limitation the attorney-client privilege, the attorney work product doctrine, the joint client privilege, the joint defense or common interest privilege, the constitutional right to privacy, and the Federal Rules of Civil Procedure.

Subject to and without waiving the foregoing objections, Brocade responds as follows:

Brocade is willing to meet and confer regarding this Request.

REQUEST FOR PRODUCTION NO. 76:

All Documents Relating to Broadcom Inc.’s efforts, either directly or indirectly, to develop, produce, sell, service, distribute, advertise, and/or market in the area encompassing all or part of Tennessee’s East Grand Division any Products Identified in response to Interrogatory number 1.

SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 76:

Brocade incorporates its original objections to this Request served on January 25, 2021 and supplements as follows: In addition to the Preliminary Statement and General Objections and objections to Interrogatory number 1, which are incorporated herein by this reference, Brocade objects to this Request as vague, ambiguous, compound, and overbroad, particularly as to SNMP’s definition of “Broadcom,” “Relating to,” Products,” and “Identified,” the vague terms “directly or indirectly” and “efforts” and “develop, produce, sell, service, distribute, advertise, and/or market,” the overbroad time period, the request for “All Documents Relating to” without further specification, and the categories required to be identified by this Interrogatory. Under SNMP’s definitions incorporated into this Request by reference to Interrogatory number 1, Brocade is defined to include, *inter alia*, all affiliated entities, including co-defendant Broadcom Inc. SNMP Research is similarly defined to include, *inter alia*, both Plaintiffs’ predecessors, agents, representatives, divisions, and subsidiaries, which are unknown to Brocade. The definition of SNMP Research Software incorporates these overbroad entity definitions, and also includes software, Source Code and Derivative Works that are beyond the scope of this lawsuit. Conducting a search for documents of such broad scope under SNMP’s defined and undefined terms would be

unduly burdensome. The Request as framed seeks documents that are irrelevant and not proportional to the needs of the case. Brocade further objects to this Request as premature as it first requires review of information in SNMP's possession, including its software and/or source code. Brocade further objects to this Request as seeking premature expert discovery, analysis, and opinion. This Request seeks a legal conclusion and assumes facts not yet proven by Plaintiffs. Moreover, no Products were Identified.

Brocade further objects to this Request as it requires the disclosure of confidential and proprietary information, documents, and tangible things of Brocade and third parties. Brocade further objects to this Requests to the extent the documents sought are not in Brocade's possession, custody, or control and are in the possession, custody, or control of third parties. Brocade further objects to this Request to the extent the documents sought are already in Plaintiffs' possession. Brocade further objects to this Request as this jurisdiction is an improper venue for this action. The Court has yet to (1) conclude that Plaintiffs have adequately made a *prima facie* showing of personal jurisdiction over Broadcom; or (2) order that Plaintiffs are entitled to jurisdictional discovery.

Brocade objects to this Request to the extent it seeks disclosure of any information, documents, or other tangible things that is protected by any applicable privilege or protection, including without limitation the attorney-client privilege, the attorney work product doctrine, the joint client privilege, the joint defense or common interest privilege, the constitutional right to privacy, and the Federal Rules of Civil Procedure.

Subject to and without waiving the foregoing objections, Brocade responds as follows:

Brocade is willing to meet and confer regarding this Request.

REQUEST FOR PRODUCTION NO. 77:

All Documents Relating to Broadcom Inc.’s awareness of the sale, marketing, advertising, servicing, or distribution in the area encompassing all or part of Tennessee’s East Grand Division any Products Identified in response to Interrogatory number 1.

SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 77:

Brocade incorporates its original objections to this Request served on January 25, 2021 and supplements as follows: In addition to the Preliminary Statement and General Objections and objections to Interrogatory number 1, which are incorporated herein by this reference, Brocade objects to this Request as vague, ambiguous, compound, and overbroad, particularly as to SNMP’s definition of “Broadcom,” “Relating to,” Products,” and “Identified,” the vague terms “directly or indirectly” and “awareness” and “sale, marketing, advertising, servicing, or distribution” the overbroad time period, the request for “All Documents Relating to,” without further specification, and the categories required to be identified by Interrogatory number 1. Under SNMP’s definitions incorporated into this Request by reference to Interrogatory number 1, Brocade is defined to include, *inter alia*, all affiliated entities, including co-defendant Broadcom Inc. SNMP Research is similarly defined to include, *inter alia*, both Plaintiffs’ predecessors, agents, representatives, divisions, and subsidiaries, which are unknown to Brocade. The definition of SNMP Research Software incorporates these overbroad entity definitions, and also includes software, Source Code and Derivative Works that are beyond the scope of this lawsuit. Conducting a search for documents of such broad scope under SNMP’s defined and undefined terms would be unduly burdensome. The Request as framed seeks documents that are irrelevant and not proportional to the needs of the case. Brocade further objects to this Request as premature as it first requires review of information in SNMP’s possession, including its software and/or source code. Brocade

further objects to this Request as seeking premature expert discovery, analysis, and opinion. This Request seeks a legal conclusion and assumes facts not yet proven by Plaintiffs. Moreover, no Products were Identified.

Brocade further objects to this Request as it requires the disclosure of confidential and proprietary information, documents, and tangible things of Brocade and third parties. Brocade further objects to this Requests to the extent the documents sought are not in Brocade's possession, custody, or control and are in the possession, custody, or control of third parties. Brocade further objects to this Request to the extent the documents sought are already in Plaintiffs' possession. Brocade further objects to this Request as this jurisdiction is an improper venue for this action. The Court has yet to (1) conclude that Plaintiffs have adequately made a *prima facie* showing of personal jurisdiction over Broadcom; or (2) order that Plaintiffs are entitled to jurisdictional discovery.

Brocade objects to this Request to the extent it seeks disclosure of any information, documents, or other tangible things that is protected by any applicable privilege or protection, including without limitation the attorney-client privilege, the attorney work product doctrine, the joint client privilege, the joint defense or common interest privilege, the constitutional right to privacy, and the Federal Rules of Civil Procedure.

Subject to and without waiving the foregoing objections, Brocade responds as follows:

Brocade is willing to meet and confer regarding this Request.

REQUEST FOR PRODUCTION NO. 78:

All Documents Relating to any Products Identified in response to Interrogatory number 1 that were sold, marketed, advertised, and/or distributed in Tennessee.

SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 78:

Brocade incorporates its original objections to this Request served on January 25, 2021 and supplements as follows: In addition to the Preliminary Statement and General Objections and objections to Interrogatory number 1, which are incorporated herein by this reference, Brocade objects to this Request as vague, ambiguous, compound, and overbroad, particularly as to SNMP's definition of "Relating to," "Identified," and "Products," the vague terms "marketed, advertised, and/or distributed, the request for "All Documents Relating to" without further specification, the overbroad time period, and the categories required to be identified by the Interrogatory. Under SNMP's definitions incorporated into this Request by reference to Interrogatory number 1, Brocade is defined to include, *inter alia*, all affiliated entities, including co-defendant Broadcom Inc. SNMP Research is similarly defined to include, *inter alia*, both Plaintiffs' predecessors, agents, representatives, divisions, and subsidiaries, which are unknown to Brocade. The definition of SNMP Research Software incorporates these overbroad entity definitions, and also includes software, Source Code and Derivative Works that are beyond the scope of this lawsuit. Conducting a search for documents of such broad scope under SNMP's defined and undefined terms would be unduly burdensome. The Request as framed seeks documents that are irrelevant and not proportional to the needs of the case. Brocade further objects to this Request as premature as it first requires review of information in SNMP's possession, including its software and/or source code. Brocade further objects to this Request as seeking premature expert discovery, analysis, and opinion. Moreover, no Products were Identified.

Brocade further objects to this Request as it requires the disclosure of confidential and proprietary information, documents, and tangible things of Brocade and third parties. Brocade further objects to this Requests to the extent the documents sought are not in Brocade's possession,

custody, or control and are in the possession, custody, or control of third parties. Brocade further objects to this Request to the extent the documents sought are already in Plaintiffs' possession. Brocade further objects to this Request as this jurisdiction is an improper venue for this action. The Court has yet to (1) conclude that Plaintiffs have adequately made a *prima facie* showing of personal jurisdiction over Broadcom; or (2) order that Plaintiffs are entitled to jurisdictional discovery.

Brocade objects to this Request to the extent it seeks disclosure of any information, documents, or other tangible things that is protected by any applicable privilege or protection, including without limitation the attorney-client privilege, the attorney work product doctrine, the joint client privilege, the joint defense or common interest privilege, the constitutional right to privacy, and the Federal Rules of Civil Procedure.

Subject to and without waiving the foregoing objections, Brocade responds as follows:

Brocade is willing to meet and confer regarding this Request.

REQUEST FOR PRODUCTION NO. 79:

All Documents Relating to any Products Identified in response to Interrogatory number 1 that were sold, marketed, advertised, and/or distributed in the area encompassing all or part of Tennessee's East Grand Division.

SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 79:

Brocade incorporates its original objections to this Request served on January 25, 2021 and supplements as follows: In addition to the Preliminary Statement and General Objections and objections to Interrogatory number 1, which are incorporated herein by this reference, Brocade objects to this Request as vague, ambiguous, compound, and overbroad, particularly as to SNMP's

definition of “Relating to,” “Identified,” and “Products,” the vague terms “marketed, sold, advertised, and/or distributed,” the request for “All Documents Relating to” without further specification, the overbroad time period, and the categories required to be identified by Interrogatory number 1. Under SNMP’s definitions incorporated into this Request by reference to Interrogatory number 1, Brocade is defined to include, *inter alia*, all affiliated entities, including co-defendant Broadcom Inc. SNMP Research is similarly defined to include, *inter alia*, both Plaintiffs’ predecessors, agents, representatives, divisions, and subsidiaries, which are unknown to Brocade. The definition of SNMP Research Software incorporates these overbroad entity definitions, and also includes software, Source Code and Derivative Works that are beyond the scope of this lawsuit. Conducting a search for documents of such broad scope under SNMP’s defined and undefined terms would be unduly burdensome. The Request as framed seeks documents that are irrelevant and not proportional to the needs of the case. Brocade further objects to this Request as premature as it first requires review of information in SNMP’s possession, including its software and/or source code. Brocade further objects to this Request as seeking premature expert discovery, analysis, and opinion. Moreover, no Products were Identified.

Brocade further objects to this Request as it requires the disclosure of confidential and proprietary information, documents, and tangible things of Brocade and third parties. Brocade further objects to this Requests to the extent the documents sought are not in Brocade’s possession, custody, or control and are in the possession, custody, or control of third parties. Brocade further objects to this Request to the extent the documents sought are already in Plaintiffs’ possession. Brocade further objects to this Request as this jurisdiction is an improper venue for this action. The Court has yet to (1) conclude that Plaintiffs have adequately made a *prima facie* showing of

personal jurisdiction over Broadcom; or (2) order that Plaintiffs are entitled to jurisdictional discovery.

Brocade objects to this Request to the extent it seeks disclosure of any information, documents, or other tangible things that is protected by any applicable privilege or protection, including without limitation the attorney-client privilege, the attorney work product doctrine, the joint client privilege, the joint defense or common interest privilege, the constitutional right to privacy, and the Federal Rules of Civil Procedure.

Subject to and without waiving the foregoing objections, Brocade responds as follows:

Brocade is willing to meet and confer regarding this Request.

REQUEST FOR PRODUCTION NO. 80:

All Documents Relating to any Products Identified in response to Interrogatory number 1 that were sold, transferred, or provided to the University of Tennessee at Knoxville, including its contractors.

SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 80:

Brocade incorporates its original objections to this Request served on January 25, 2021 and supplements as follows: In addition to the Preliminary Statement and General Objections and objection to Interrogatory number 1, which are incorporated herein by this reference, Brocade objects to this Request as vague, ambiguous, compound, and overbroad, particularly as to SNMP's definition of "Relating to," "Identified," and "Products," the vague terms "transferred" and "provided" and the "its contractors," the request for "All Documents Relating to" without further specification, the overbroad time period, and the categories required to be identified. Under SNMP's definitions incorporated into this Request by reference to Interrogatory number 1 by this

Interrogatory, Brocade is defined to include, *inter alia*, all affiliated entities, including co-defendant Broadcom Inc. SNMP Research is similarly defined to include, *inter alia*, both Plaintiffs' predecessors, agents, representatives, divisions, and subsidiaries, which are unknown to Brocade. The definition of SNMP Research Software incorporates these overbroad entity definitions, and also includes software, Source Code and Derivative Works that are beyond the scope of this lawsuit. Conducting a search for documents of such broad scope under SNMP's defined and undefined terms would be unduly burdensome. The Request as framed seeks documents that are irrelevant and not proportional to the needs of the case. Brocade further objects to this Request as premature as it first requires review of information in SNMP's possession, including its software and/or source code. Brocade further objects to this Request as seeking premature expert discovery, analysis, and opinion. Moreover, no Products were Identified.

Brocade further objects to this Request as it requires the disclosure of confidential and proprietary information, documents, and tangible things of Brocade and third parties. Brocade further objects to this Requests to the extent the documents sought are not in Brocade's possession, custody, or control and are in the possession, custody, or control of third parties. Brocade further objects to this Request to the extent the documents sought are already in Plaintiffs' possession. Brocade further objects to this Request as this jurisdiction is an improper venue for this action. The Court has yet to (1) conclude that Plaintiffs have adequately made a *prima facie* showing of personal jurisdiction over Broadcom; or (2) order that Plaintiffs are entitled to jurisdictional discovery.

Brocade objects to this Request to the extent it seeks disclosure of any information, documents, or other tangible things that is protected by any applicable privilege or protection, including without limitation the attorney-client privilege, the attorney work product doctrine, the

joint client privilege, the joint defense or common interest privilege, the constitutional right to privacy, and the Federal Rules of Civil Procedure.

Subject to and without waiving the foregoing objections, Brocade responds as follows:

Brocade is willing to meet and confer regarding this Request.

REQUEST FOR PRODUCTION NO. 81:

All Documents Relating to any Products Identified in response to Interrogatory number 1 that were sold, transferred, or provided to Blue Cross Blue Shield of Tennessee, including its contractors.

SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 81:

Brocade incorporates its original objections to this Request served on January 25, 2021 and supplements as follows: In addition to the Preliminary Statement and General Objections and objections to Interrogatory number 1, which are incorporated herein by this reference, Brocade objects to this Request as vague, ambiguous, compound, and overbroad, particularly as to SNMP's definition of "Relating to," "Identified," and "Products," the vague terms "transferred" and "provided to" and "contractors," the request for "All Documents Relating to" without further specification, the overbroad time period, and the categories required to be identified by the Interrogatory. Under SNMP's definitions incorporated into this Request by reference to Interrogatory number 1, Brocade is defined to include, *inter alia*, all affiliated entities, including co-defendant Broadcom Inc. SNMP Research is similarly defined to include, *inter alia*, both Plaintiffs' predecessors, agents, representatives, divisions, and subsidiaries, which are unknown to Brocade. The definition of SNMP Research Software incorporates these overbroad entity definitions, and also includes software, Source Code and Derivative Works that are beyond the

scope of this lawsuit. Conducting a search for documents of such broad scope under SNMP's defined and undefined terms would be unduly burdensome. The Request as framed seeks documents that are irrelevant and not proportional to the needs of the case. Brocade further objects to this Request as premature as it first requires review of information in SNMP's possession, including its software and/or source code. Brocade further objects to this Request as seeking premature expert discovery, analysis, and opinion. Moreover, no Products were Identified.

Brocade further objects to this Request as it requires the disclosure of confidential and proprietary information, documents, and tangible things of Brocade and third parties. Brocade further objects to this Requests to the extent the documents sought are not in Brocade's possession, custody, or control and are in the possession, custody, or control of third parties. Brocade further objects to this Request to the extent the documents sought are already in Plaintiffs' possession. Brocade further objects to this Request as this jurisdiction is an improper venue for this action. The Court has yet to (1) conclude that Plaintiffs have adequately made a *prima facie* showing of personal jurisdiction over Broadcom; or (2) order that Plaintiffs are entitled to jurisdictional discovery.

Brocade objects to this Request to the extent it seeks disclosure of any information, documents, or other tangible things that is protected by any applicable privilege or protection, including without limitation the attorney-client privilege, the attorney work product doctrine, the joint client privilege, the joint defense or common interest privilege, the constitutional right to privacy, and the Federal Rules of Civil Procedure.

Subject to and without waiving the foregoing objections, Brocade responds as follows:

Brocade is willing to meet and confer regarding this Request.

REQUEST FOR PRODUCTION NO. 82:

All Documents Relating to any Products Identified in response to Interrogatory number 1 that were sold, transferred, or provided to Oak Ridge National Laboratory (ORNL) or Y12 National Security Complex, including its contractors.

SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 82:

Brocade incorporates its original objections to this Request served on January 25, 2021 and supplements as follows: In addition to the Preliminary Statement and General Objections and objections to Interrogatory number 1, which are incorporated herein by this reference, Brocade objects to this Request as vague, ambiguous, compound, and overbroad, particularly as to SNMP's definition of "Relating to," "Identified," and "Products," the vague terms "transferred" and "provided" and "its contractors," the request for "All Documents Relating to" without further specification, the overbroad time period, and the categories required to be identified by Interrogatory number 1. Under SNMP's definitions incorporated into this Request by reference to Interrogatory number 1, Brocade is defined to include, *inter alia*, all affiliated entities, including co-defendant Broadcom Inc. SNMP Research is similarly defined to include, *inter alia*, both Plaintiffs' predecessors, agents, representatives, divisions, and subsidiaries, which are unknown to Brocade. The definition of SNMP Research Software incorporates these overbroad entity definitions, and also includes software, Source Code and Derivative Works that are beyond the scope of this lawsuit. Conducting a search for documents of such broad scope under SNMP's defined and undefined terms would be unduly burdensome. The Request as framed seeks documents that are irrelevant and not proportional to the needs of the case. Brocade further objects to this Request as premature as it first requires review of information in SNMP's possession,

including its software and/or source code. Brocade further objects to this Request as seeking premature expert discovery, analysis, and opinion. Moreover, no Products were Identified.

Brocade further objects to this Request as it requires the disclosure of confidential and proprietary information, documents, and tangible things of Brocade and third parties. Brocade further objects to this Requests to the extent the documents sought are not in Brocade's possession, custody, or control and are in the possession, custody, or control of third parties. Brocade further objects to this Request to the extent the documents sought are already in Plaintiffs' possession. Brocade further objects to this Request as this jurisdiction is an improper venue for this action. The Court has yet to (1) conclude that Plaintiffs have adequately made a *prima facie* showing of personal jurisdiction over Broadcom; or (2) order that Plaintiffs are entitled to jurisdictional discovery.

Brocade objects to this Request to the extent it seeks disclosure of any information, documents, or other tangible things that is protected by any applicable privilege or protection, including without limitation the attorney-client privilege, the attorney work product doctrine, the joint client privilege, the joint defense or common interest privilege, the constitutional right to privacy, and the Federal Rules of Civil Procedure.

Subject to and without waiving the foregoing objections, Brocade responds as follows:

Brocade is willing to meet and confer regarding this Request.

REQUEST FOR PRODUCTION NO. 83:

All Documents Relating to Brocade's distributors or partners in Tennessee which at any time have sold, marketed, advertised, and/or distributed Products Identified in response to Interrogatory number 1.

SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 83:

Brocade incorporates its original objections to this Request served on January 25, 2021 and supplements as follows: In addition to the Preliminary Statement and General Objections and objections to Interrogatory number 1, which are incorporated herein by this reference, Brocade objects to this Request as vague, ambiguous, compound, and overbroad, particularly as to SNMP's definition of "Relating to," "Brocade," and "Products," the vague terms "marketed, advertised, and/or distributed," and "distributors or partners," the request for "All Documents Relating to" "any time" without further specification, the overbroad time period, and the categories required to be identified by the Interrogatory. Under SNMP's definitions incorporated into this Request by reference to Interrogatory number 1, Brocade is defined to include, *inter alia*, all affiliated entities, including co-defendant Broadcom Inc. SNMP Research is similarly defined to include, *inter alia*, both Plaintiffs' predecessors, agents, representatives, divisions, and subsidiaries, which are unknown to Brocade. The definition of SNMP Research Software incorporates these overbroad entity definitions, and also includes software, Source Code and Derivative Works that are beyond the scope of this lawsuit. Conducting a search for documents of such broad scope under SNMP's defined and undefined terms would be unduly burdensome. The Request as framed seeks documents that are irrelevant and not proportional to the needs of the case. Brocade further objects to this Request as premature as it first requires review of information in SNMP's possession, including its software and/or source code. Brocade further objects to this Request as seeking premature expert discovery, analysis, and opinion. Moreover, no Products were Identified.

Brocade further objects to this Request as it requires the disclosure of confidential and proprietary information, documents, and tangible things of Brocade and third parties. Brocade further objects to this Requests to the extent the documents sought are not in Brocade's possession,

custody, or control and are in the possession, custody, or control of third parties. Brocade further objects to this Request to the extent the documents sought are already in Plaintiffs' possession. Brocade further objects to this Request as this jurisdiction is an improper venue for this action. The Court has yet to (1) conclude that Plaintiffs have adequately made a *prima facie* showing of personal jurisdiction over Broadcom; or (2) order that Plaintiffs are entitled to jurisdictional discovery.

Brocade objects to this Request to the extent it seeks disclosure of any information, documents, or other tangible things that is protected by any applicable privilege or protection, including without limitation the attorney-client privilege, the attorney work product doctrine, the joint client privilege, the joint defense or common interest privilege, the constitutional right to privacy, and the Federal Rules of Civil Procedure.

Subject to and without waiving the foregoing objections, Brocade responds as follows:

Brocade is willing to meet and confer regarding this Request.

REQUEST FOR PRODUCTION NO. 84:

All Documents Relating to Brocade's distributors or partners in the area encompassing all or part of Tennessee's East Grand Division which at any time have sold, marketed, advertised, and/or distributed Products Identified in response to Interrogatory number 1.

SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 84:

Brocade incorporates its original objections to this Request served on January 25, 2021 and supplements as follows: In addition to the Preliminary Statement and General Objections and objections to Interrogatory number 1, which are incorporated herein by this reference, Brocade objects to this Request as vague, ambiguous, compound, and overbroad, particularly as to SNMP's

definition of “Relating to,” “Brocade,” and “Products,” the vague terms “marketed, advertised, and/or distributed” and “distributors or partners,” the request for “All Documents Relating to” “at any time” without further specification, the overbroad time period, and the categories required to be identified by the Interrogatory. Under SNMP’s definitions incorporated into this Request by reference to Interrogatory number 1, Brocade is defined to include, *inter alia*, all affiliated entities, including co-defendant Broadcom Inc. SNMP Research is similarly defined to include, *inter alia*, both Plaintiffs’ predecessors, agents, representatives, divisions, and subsidiaries, which are unknown to Brocade. The definition of SNMP Research Software incorporates these overbroad entity definitions, and also includes software, Source Code and Derivative Works that are beyond the scope of this lawsuit. Conducting a search for documents of such broad scope under SNMP’s defined and undefined terms would be unduly burdensome. The Request as framed seeks documents that are irrelevant and not proportional to the needs of the case. Brocade further objects to this Request as premature as it first requires review of information in SNMP’s possession, including its software and/or source code. Brocade further objects to this Request as seeking premature expert discovery, analysis, and opinion. Moreover, no Products were Identified.

Brocade further objects to this Request as it requires the disclosure of confidential and proprietary information, documents, and tangible things of Brocade and third parties. Brocade further objects to this Requests to the extent the documents sought are not in Brocade’s possession, custody, or control and are in the possession, custody, or control of third parties. Brocade further objects to this Request to the extent the documents sought are already in Plaintiffs’ possession. Brocade further objects to this Request as this jurisdiction is an improper venue for this action. The Court has yet to (1) conclude that Plaintiffs have adequately made a *prima facie* showing of

personal jurisdiction over Broadcom; or (2) order that Plaintiffs are entitled to jurisdictional discovery.

Brocade objects to this Request to the extent it seeks disclosure of any information, documents, or other tangible things that is protected by any applicable privilege or protection, including without limitation the attorney-client privilege, the attorney work product doctrine, the joint client privilege, the joint defense or common interest privilege, the constitutional right to privacy, and the Federal Rules of Civil Procedure.

Subject to and without waiving the foregoing objections, Brocade responds as follows:

Brocade is willing to meet and confer regarding this Request.

REQUEST FOR PRODUCTION NO. 85:

All Documents Relating to the “Consummation of the Merger” Identified at page 8 of Brocade Communications Systems, Inc.’s 2017 Form 10-Q for the quarterly period ended July 29, 2017.

SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 85:

Brocade incorporates its original objections to this Request served on January 25, 2021 and supplements as follows: In addition to the Preliminary Statement and General Objections, which are incorporated herein by this reference, Brocade objects to this Request as vague, ambiguous, compound, and overbroad, particularly as to SNMP’s definition of “Relating to,” “Brocade,” and “Identified,” the vague term “Consummation of the Merger,” the request for “All Documents Relating to” without further specification, and the overbroad time period. Under SNMP’s definitions incorporated into this Request, Brocade is defined to include, *inter alia*, all affiliated entities, including co-defendant Broadcom Inc. Conducting a search for documents of such broad

scope under SNMP's defined and undefined terms would be unduly burdensome. The Request as framed seeks documents that are irrelevant and not proportional to the needs of the case. This Request is not tied to any claims or defenses in this case.

Brocade further objects to this Request as it requires the disclosure of confidential and proprietary information, documents, and tangible things of Brocade and third parties. Brocade further objects to this Requests to the extent the documents sought are not in Brocade's possession, custody, or control and are in the possession, custody, or control of third parties. Brocade further objects to this Request to the extent the documents sought are already in Plaintiffs' possession. Brocade further objects to this Request as this jurisdiction is an improper venue for this action.

Brocade objects to this Request to the extent it seeks disclosure of any information, documents, or other tangible things that is protected by any applicable privilege or protection, including without limitation the attorney-client privilege, the attorney work product doctrine, the joint client privilege, the joint defense or common interest privilege, the constitutional right to privacy, and the Federal Rules of Civil Procedure.

Subject to and without waiving the foregoing objections, Brocade responds as follows:

Brocade is willing to meet and confer regarding this Request.

REQUEST FOR PRODUCTION NO. 86:

Documents sufficient to Identify the Persons involved in the management of Brocade Communications Systems LLC.

SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 86:

Brocade incorporates its original objections to this Request served on January 25, 2021 and supplements as follows: In addition to the Preliminary Statement and General Objections, which

are incorporated herein by this reference, Brocade objects to this Request as vague, ambiguous, compound, and overbroad, particularly as to SNMP's definition of "Brocade" and "Identify" and "Persons," the vague term "in the management of," the request for "All Documents sufficient to" without further specification, and the overbroad time period. Under SNMP's definitions incorporated into this Request, Brocade is defined to include, *inter alia*, all affiliated entities, including co-defendant Broadcom Inc. Conducting a search for documents of such broad scope under SNMP's defined and undefined terms would be unduly burdensome. The Request as framed seeks documents that are irrelevant and not proportional to the needs of the case.

Brocade further objects to this Request as it requires the disclosure of confidential and proprietary information, documents, and tangible things of Brocade and third parties. Brocade further objects to this Requests to the extent the documents sought are not in Brocade's possession, custody, or control and are in the possession, custody, or control of third parties. Brocade further objects to this Request to the extent the documents sought are already in Plaintiffs' possession. Brocade further objects to this Request as this jurisdiction is an improper venue for this action.

Brocade objects to this Request to the extent it seeks disclosure of any information, documents, or other tangible things that is protected by any applicable privilege or protection, including without limitation the attorney-client privilege, the attorney work product doctrine, the joint client privilege, the joint defense or common interest privilege, the constitutional right to privacy, and the Federal Rules of Civil Procedure.

Subject to and without waiving the foregoing objections, Brocade responds as follows:

Brocade will produce on a rolling basis non-privileged documents, to the extent they exist, are in its possession, custody, or control, and are located after a reasonably diligent search, that are

sufficient to identify persons involved in the management of Brocade Communications Systems LLC.

Dated: October 4, 2021

HUESTON HENNIGAN LLP

By: */s/ Alison Plessman*

Alison Plessman
Attorneys for Defendants
Broadcom Inc.
Brocade Communications Systems LLC

PROOF OF SERVICE

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My business address is 523 West 6th Street, Suite 400, Los Angeles, CA 90014.

On October 4, 2021, I served the foregoing document(s) described as:

**BROCADE COMMUNICATIONS SYSTEMS LLC'S FIRST SUPPLEMENTAL RESPONSES
AND OBJECTIONS TO SNMP RESEARCH, INC.'S FIRST SET OF REQUESTS FOR
PRODUCTION**

on the interested parties in this action as stated below:

John L. Wood, Esq.
Cheryl G. Rice, Esq.
Rameen J. Nasrollahi,
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& DAVIS, P.C.
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(BY E-MAIL) By transmitting the documents listed above to the e-mail addresses set forth above.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct, and that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on October 4, 2021, at Los Angeles, California.

Debi Del Grande
(Type or print name)

Debi Del Grande
(Signature)